



JOHN OESCH  
PLANT MANAGER

# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

July 03, 1995

**RECEIVED**

JUL 07 1995

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Barbara Mazur

Z 055 522 324

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

Z 055 522 325

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 13**

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

-1-

In Mr. John F. Oesch's letter of May 10, 1995, American Steel Foundries formally submitted the "ELECTRIC ARC FURNACE BAGHOUSE CLOSURE CERTIFICATION REPORT" to the U.S. EPA and the Ohio EPA.

Mr. John Palmer from the Northeast District Office, Ohio EPA, inspected the Electric Arc Furnace Baghouse Closure Unit site at the Alliance Plant of American Steel Foundries on June 14, 1995.

In a June 21, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John acknowledged receipt of the Closure Certification Report the Electric Arc Furnace Baghouse.

**D. SEBRING FACILITY -Closure and Post Closure Requirements:**

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

As an attachment to a February 27, 1995 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, submitted a February 1995 revision of the Surcharge and Settlement Plan for Ohio EPA review.

On March 04, 1995 the initial phase of the construction work for the Surcharge and Settlement Plan was completed at the Sebring Landfill.

In a March 07, 1995 correspondence from Mr. John Palmer, Environmental Specialist, Ohio EPA, to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John asked for clarification of details for the Sebring Landfill Surcharge and Settlement Plan.

On March 27, 1995 in a letter to Mr. John Palmer, Ohio EPA, Northeast District Office, Ms. B. M. Wellman, American Steel Foundries responded to Mr. John Palmer's March 07, 1995 request.

Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, responded to Mr. John Palmer's March 7, 1995 correspondence of concerns in a March 27, 1995 letter.

In an April 4, 1995 letter to Ms. B. M. Wellman of American Steel Foundries, Mr. John Palmer from Ohio EPA acknowledged receipt of the March 27, 1995 submittal.

In an April 18, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the April 5, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the April 18, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in an April 27, 1995 letter.

On April 27, 1995 a meeting was held at the Alliance Plant of American Steel Foundries with representatives of the Ohio EPA Columbus Office and the Northeast District Office. Also included in the discussions were representatives from Roy F. Weston Inc., American Steel Foundries' consultant.

Topics of discussion in the April 27, 1995 meeting included the following:

1. A preliminary review of the Revised Sebring Landfill Closure Plan.
2. December Groundwater Sample Report
3. Revisions to Groundwater Monitoring Well program
4. Surcharge and Settlement Plan activities
5. Plans for Separation Berm Construction
6. A site review

In a May 16, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the May 8, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the May 16, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in a May 19, 1995 letter.

In a June 13, 1995 telefax From Mr. John Palmer, Ohio EPA to Ms. B. M. Wellman, American Steel Foundries, John requested additional information about to the separation berm construction.

In a June 13, 1995 letter from Mr. Gary Deigan of Roy F. Weston Inc. for American Steel Foundries, four of the concerns from Mr. Palmer's Telefax were addressed with attached construction specifications. Comment No. 5 of Mr. Palmer's telefax will to be addressed under separate cover.

In a June 13, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the June 7, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the June 13, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in a June 15, 1995 letter.

**E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In an April 4, 1995 letter subtitled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's March 6, 1995 letter to Ms. B. M. Wellman that requested comments from the June 1994 sampling event report.

Mr. Palmer from the Ohio EPA acknowledged receipt of the "1994 Interim Status Supplementary Annual Report Forms" in an April 20, 1995 letter to Ms. B. M. Wellman at American Steel Foundries.

In a May 26, 1995 letter Mr. T. C. Bradway from American Steel Foundries asked Mr. Joseph Amabeli, Waste water Treatment Coordinator, Alliance City Water Department for permission to discharge to the sanitary sewer purge and well development water from the March 1995 drilling and sampling event at the Sebring Landfill.

Mr. Amabeli granted permission to discharge the purge and development water from the March 1995 event in his June 2, 1995 response to the May 26, 1995 request.

The semiannual groundwater monitoring well sampling report is currently being reviewed for submittal in the very near future.

The next sampling event is tentatively scheduled for the week of September 18, 1995.



### **TEST RESULTS AND SAMPLING SUMMARY**

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.


### **ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

### **CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

TCB  
Attachment

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: REB  
BMW  
PFF  
RML  
RBR

Ohio EPA Z 055 522 326  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

Ohio EPA Z 055 522 327  
Division of Hazardous Waste Management  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 328  
Supervisor, division of Solid and Infectious Waste Management  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.  
Amsted Industries, Inc.  
44th Floor - Boulevard Towers South  
205 N. Michigan Ave.  
Chicago, Illinois 60601

Mahoning County Health District Z 055 522 329  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R. D. Setty

C:\WP51\HAZWASTE\USVAMSTD.TB6



JOHN OESCH  
PLANT MANAGER

# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 821-6160  
FAX NO. (216) 821-4568

April 04, 1995

**RECEIVED**  
APR 12 1995

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA REGION V**

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Barbara Mazur

Z 055 522 278

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

Z 055 522 279

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 12**

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure was prepared for submittal in early October.

In accordance with Mr. John Palmer's instructions to Ms. Bernadette Wellman at ASF, a Closure Certification Report has been prepared in accordance with Ohio Administrative Code and the most recent RCRA Closure Guidance Document in addition to the EAF Closure Activity Report submitted on October 12, 1994. The document is currently undergoing final review prior to submittal.

**D. SEBRING FACILITY -Closure and Post Closure Requirements:**

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

In a December 09, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the new Sebring Landfill Closure Plan.

Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the new Sebring Landfill Closure Plan Closure Cost Estimate in a December 16, 1994 letter.

In a December 19, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

On January 20, 1995 Mr. John Palmer, Environmental Specialist, Ohio EPA, acknowledged receipt of the Landfill Closure Plan in a letter to Mr. Terry Bradway, Environmental Manager, American Steel Foundries.

On January 12, 1995 a progress review meeting was held at the Ohio EPA Northeast District Office in Twinsburg, Ohio. ASF requested the meeting to discuss the progress in all areas of concern in the Consent Decree and Ohio Consent Order. Those in attending included Mr. John Palmer from Ohio EPA, Ms. B. M. Wellman and Mr. T. C. Bradway from American Steel Foundries.

A revision to Schedule 3.6, page 18 of the Landfill Closure Plan, was submitted with a January 20, 1995 letter from Mr. John Oesch, Plant Manager, American Steel Foundries.

On February 09, 1995 construction work for the initial phase of the Surcharge and Settlement Plan was begun at the Sebring Landfill.

On February 22, 1995 Mr. John Palmer and Mr. Eric Adams visited the Sebring Landfill to view the initial construction phase of the Surcharge and Settlement Plan activity and to review the proposed locations of the additional monitoring wells.

As an attachment to a February 27, 1995 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, submitted a February 1995 revision of the Surcharge and Settlement Plan for Ohio EPA review.

On March 04, 1995 the initial phase of the construction work for the Surcharge and Settlement Plan was completed at the Sebring Landfill.

In a March 07, 1995 correspondence from Mr. John Palmer, Environmental Specialist, Ohio EPA, to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John asked for clarification of details for the Sebring Landfill Surcharge and Settlement Plan.

On March 27, 1995 in a letter to Mr. John Palmer, Ohio EPA, Northeast District Office, Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries responded to Mr. John Palmer's request for clarification of details.

Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, responded to Mr. John Palmer's March 7, 1995 correspondence of concerns in a March 27, 1995 letter.

#### **E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a

Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a December 05, 1994 Letter subtitled "Sampling Report No. 4" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the September 14 and 15, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

The City of Alliance Department of Waste Water Treatment gave ASF approval to discharge to the sanitary sewer purge water from the September 1994 sampling of ground water sampling wells at the Sebring Landfill in a December 13, 1994 letter from Joseph Amabeli, Wastewater Coordinator to Terry Bradway.

In a December 19, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the "1993 Supplementary Annual Report" notice of deficiencies.

In a December 21, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the June 28, 1994 notice of deficiencies from Mr. John Palmer, Ohio EPA.

Mr. John Palmer Acknowledged receipt of documents addressing ground water issues in a December 27, 1994 correspondence to Mr. T. C. Bradway.

A copy of the Groundwater Quality Assessment for the Sebring Facility was included as an appendix of the New Landfill Closure Plan that was submitted by Mr. John F. Oesch's letter of December 09, 1994. The document has been revised to reflect changes requested in both of Mr. John Palmer's letters of November 23, 1994. The revised document was submitted in a January 06, 1995 letter by Mr. John F. Oesch, Plant Manager, American Steel Foundries.

In a January 17, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries the Ohio EPA acknowledged receipt of the Ground Water Quality Assessment Plan.

In a February 14, 1995 letter, Mr. John Palmer formally informed Ms. Wellman that the Ohio EPA was going to perform a "Comprehensive Ground Water Monitoring Evaluation" during our next well sampling event on March 21, 1995.

Messrs. John Palmer and Eric Adams of the Ohio EPA gave approval for new well locations in accordance with the Proposed Groundwater Sampling Plan during a telephone conversation on February 17, 1995 with Terry Bradway from ASF.

In a February 28, 1995 letter, Mr. John F. Oesch, Plant Manager, American Steel Foundries submitted a copy of the GRITS/STAT data a potentiometric map in accordance with Mr. John Palmer's June 28, 1994 evaluation of groundwater data submission from his letter of December 27, 1994.

On March 06, 1995 Mr. John Palmer, Ohio EPA acknowledged receipt of the February 28, 1995 submittals in a letter to Ms. B. M. Wellman.

Mr. John Palmer from the Northeast District Office of the Ohio EPA responded to the June 15 through 17 sampling event of the ground water monitoring wells in a March 06, 1995 letter to Ms. B. M. Wellman at American Steel Foundries.

The next sampling event is tentatively scheduled for the week of September 18, 1995.

### TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

The following waste streams were recently sampled and are reported as attachment "B":

1. Spent Foundry Sand
2. Floor Sweepings
3. Refractory Brick
4. Broken Core Butts
5. Dewatered Clarifier Sludge
6. Broken Fluorescent Light Bulbs
7. Kerosene, Diesel Fuel and Oil
8. Water & Oil
9. Mineral Spirits, Coolant and Water
10. Waste Oil

### ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

### CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

TCB



UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW  
JW  
RML  
RBR

Ohio EPA Z 055 522 280  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

Ohio EPA Z 055 522 281  
Division of Hazardous Waste Management  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 282  
Supervisor, division of Solid and Infectious Waste Management  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.  
Amsted Industries, Inc.  
44th Floor - Boulevard Towers South  
205 N. Michigan Ave.  
Chicago, Illinois 60601

P. C. Schillawski Z 055 522 283  
Squire Sanders & Dempsey  
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127 Public Square  
Cleveland, Ohio 44114-1304

Mahoning County Health District Z 055 522 284  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty





# American Steel Foundries

1001 EAST BROADWAY • P.O. BOX 2060 • ALLIANCE, OHIO 44601

(216) 823-6150 • FAX NO. (216) 821-4568

January 09, 1995

**RECEIVED**

JAN 12 1995

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Barbara Mazur

**Z 055 522 223**

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

**Z 055 522 224**

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 11**

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure was prepared for submittal in early October.

In his October 12, 1994 letter, Mr. J. F. Oesch, Plant Manager, American Steel Foundries submitted an EAF Closure Activity Report to the Ohio EPA and the U.S. EPA.

In accordance with Mr. John Palmer's instructions to Ms. Bernadette Wellman at ASF, a Closure Certification Report is being prepared in accordance with Ohio Administrative Code and the most recent RCRA Closure Guidance Document in addition to the EAF Closure Activity Report submitted on October 12, 1994. The document will be submitted in January 1995.

**D. SEBRING FACILITY -Closure and Post Closure Requirements:**

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4).

In a June 01, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries requested a meeting with the agency to discuss beneficial reuse of foundry wastes and possible modifications to the landfill cap design.

On July 25, 1994 a meeting was held between Ohio EPA and American Steel Foundries at the Ohio EPA Northeast District Office in Twinsburg, Ohio to discuss Sebring Landfill Closure Plan issues and waste reduction. As a direct result of that meeting the cap outlined in the closure plan document is being redesigned and a modified closure plan is being prepared.

In an August 05, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries withdrew the Landfill Closure Plan dated January 1993 and stated that a revised plan would be submitted no later than December 15, 1994. The revised plan will include issues critical to the Ohio EPA and American Steel Foundries as outlined in the August 05, 1994 letter and discussed in the July 25, 1994 meeting.

In an October 04, 1994 letter to Mr. John Palmer, Ohio EPA, Ms. Bernadette Wellman from American Steel Foundries submitted a list of questions for Ohio EPA review relative to the redesigned landfill cap. Response and/or clarification was requested so that American Steel Foundries could finalize the new Sebring Landfill Closure plan.

Mr. John Palmer, Ohio EPA responded to Ms. Wellman's October 04, 1994 clarification requests with his letters dated October 24, 1994, November 01, 1994 and November 09, 1994.

On November 11, 1994, Mr. John Worries, American Steel Foundries submitted a progress report to Mr. Ed Kitchen, Environmental Manager, Ohio EPA. Topics of discussion included a projected submittal date of December 15, 1994 for the new Sebring Landfill Closure Plan.

In a December 09, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the new Sebring Landfill Closure Plan.

Mr. Edward J. Brosius, Assistant General Counsel & Assistant Secretary, Amsted Industries Inc. demonstrated Financial Assurance to the EPA in letter dated December 20, 1994.

Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the new Sebring Landfill Closure Plan Closure Cost Estimate in a December 16, 1994 letter.

On December 19, 1994, Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

In a "NOTIFICATION OF ERROR" letter dated December 21, 1994, Mr. T. C. Bradway, Environmental Manager, American Steel Foundries informed the Ohio EPA and the U. S. EPA that the possibility existed that the wrong cover letter had been sent with the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

**E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a June 28, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer from Ohio EPA listed his notice of deficiencies for the February 23, 1994 Groundwater Sampling Report of the December 14 through 17, 1993 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" American Steel Foundries responded to Mr. John Palmer's June 28, 1994 notice of deficiencies letter.

Ms. Bernadette Wellman Manager of Environmental Affairs, American Steel Foundries received a response to the July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" covering the notice of deficiency to the February 23, 1994 Groundwater sampling event by Mr. John Palmer from the Ohio EPA in a November 23, 1994 letter.

In a July 15, 1994 letter from Mr. John Palmer of the Ohio EPA to Mr. Terry Bradway at American Steel Foundries, John listed a notice of deficiencies for the Supplementary Annual Report for the 1993 Ground Water Monitoring of the Sebring Landfill.

In a July 22, 1994 letter subtitled "Response to Groundwater Comments", American Steel Foundries addressed Mr. Palmer's notice of Deficiencies from the July 15, 1994 letter.

Ms. Bernadette Wellman Manager of Environmental Affairs, American Steel Foundries received a response to the July 22, 1994 letter subtitled "Response to Groundwater Comments" for the notice of deficiency to the "1993 Supplementary Annual Report" by Mr. John Palmer from the Ohio EPA in a November 23, 1994 letter.

In a December 05, 1994 Letter subtitled "Sampling Report No. 4" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the September 14 and 15, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a December 19, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the "1993 Supplementary Annual Report" notice of deficiencies.

In a December 21, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the June 28, 1994 notice of deficiencies from Mr. John Palmer, Ohio EPA.

A copy of the Groundwater Quality Assessment for the Sebring Facility was included as an appendix of the New Landfill Closure Plan that was submitted by Mr. John F. Oesch's letter of December 09, 1994. Currently the document is being revised to reflect changes requested in both of Mr. John Palmer's letters of November 23, 1994. The revised document was submitted in a January 06, 1995 letter by Mr. John F. Oesch, Plant Manager, American Steel Foundries.

The next sampling event is tentatively scheduled for the week of March 13, 1995.

## **TEST RESULTS AND SAMPLING SUMMARY**

Our experiments to reduce lead and cadmium in Electric Arc Furnace dust have concluded. Although American Steel Foundries has been successful in reducing the levels of toxicity in the dust, we have not been successful in keeping them consistently below TCLP regulatory action levels for hazardous materials. However, we plan to monitor each load of dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In December 1994 the following waste streams were sampled:

1. Spent Foundry Sand
2. Floor Sweepings
3. Refractory Brick
4. Broken Core Butts

Test results from that sampling have not been received to date but will be included in the next quarterly report.

A waste stream profile was established for material from a spill of Terrapaint Core Wash. Please see attachment "B".

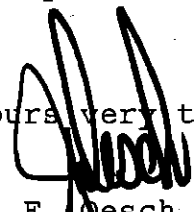
## **ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

## **CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

TCB



UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW  
JW  
RML  
RBR

Ohio EPA Z 055 522 225  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

Ohio EPA Z 055 522 226  
Division of Solid and Hazardous Waste  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 227  
Supervisor, division of Solid and Infectious Waste Management  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

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Amsted Industries, Inc.  
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P. C. Schillawski Z 055 522 228  
Squire Sanders & Dempsey  
4900 Society Center  
127 Public Square  
Cleveland, Ohio 44114-1304

Mahoning County Health District Z 055 522 229  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTD.TB4





JOHN OESCH  
PLANT MANAGER

# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

October 04, 1994

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Barbara Mazur

**RECEIVED**  
OCT 11 1994

Z 309 033 155

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

Z 309 033 156

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 10**

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

In a June 10, 1994 letter Mr. J. F. Oesch, Plant Manager, American Steel Foundries, submitted the Background Sampling Analysis Report for the Electric Arc Furnace Baghouse Hazardous Waste Management Unit in accordance with Mr. John Palmer's Ohio EPA letter of May 09, 1994.

In a June 15, 1994 letter to Mr. Terry Bradway of American Steel Foundries, John Palmer acknowledged Ohio EPA receipt of the Background Sampling Analysis Report.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure is being prepared for submittal in early October. It will include a risk assessment for the contaminated material of concern remaining in the unit.

**D. SEBRING FACILITY -Closure and Post Closure Requirements:**

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4).

In a June 01, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries requested a meeting with the agency to discuss beneficial reuse of foundry wastes and possible modifications to the landfill cap design.

On July 25, 1994 a meeting was held between Ohio EPA and American Steel Foundries at the Ohio EPA Northeast District Office in Twinsburg, Ohio to discuss Sebring Landfill Closure Plan issues and waste reduction. As a direct result of that meeting the cap outlined in the closure plan document is being redesigned and a modified closure plan is being prepared.

In an August 05, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries withdrew the Landfill Closure Plan dated January 1993 and stated that a revised plan would be submitted no later than December 15, 1994. The revised plan will include issues critical to the Ohio EPA and American Steel Foundries as outlined in the August 05, 1994 letter and discussed in the July 25, 1994 meeting.

On September 13, 1994 four members of the Ohio EPA were invited guests at a Waste Reduction Committee Meeting held at the Alliance Plant of American Steel Foundries and were thoroughly briefed on the waste reduction activities at that plant. After the meeting, the guests toured the facility. Mr. John Palmer met with Mr. R. M. Locke and Ms. B. M. Wellman following the meeting to discuss various closure activities.

**E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA

and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a June 28, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer from Ohio EPA listed his notice of deficiencies for the February 23, 1994 Groundwater Sampling Report of the December 14 through 17, 1993 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" American Steel Foundries responded to Mr. John Palmer's June 28, 1994 notice of deficiencies letter.

In a July 15, 1994 letter from Mr. John Palmer of the Ohio EPA to Mr. Terry Bradway at American Steel Foundries, John listed a notice of deficiencies for the Supplementary Annual Report for the 1993 Ground Water Monitoring of the Sebring Landfill.

In a July 22, 1994 letter subtitled "Response to Groundwater Comments", American Steel Foundries Addressed Mr. Palmer's notice of Deficiencies from the July 15, 1994 letter.

In a July 22, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer of the Ohio EPA listed his notice of deficiencies for the May 09, 1994 "Sampling Report No. 2" covering the March 15 through 16, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 27, 1994 letter subtitled "Groundwater Sampling Report Response to Comments", American Steel Foundries responded to Mr. Palmer's July 22, 1994 correspondence.

In an August 05, 1994 Letter subtitled "Sampling Report No. 3" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the June 15 through 17, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

RMT Inc. performed the fourth sampling of the monitoring wells the week of September 12, 1994. The test results from the sampling have not been received to date.

RMT Inc. is preparing a summary report of the first four quarterly sampling events in accordance with the approved Groundwater Quality Assessment Plan for the Sebring Facility.

#### **TEST RESULTS AND SAMPLING SUMMARY**

Our experiments to reduce lead and cadmium in Electric Arc Furnace dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate. Its impact on our furnace operation is being evaluated.

American Waste and BFI have also sampled several waste streams during the previous period and test results have been received. See attachment "B"

Waste stream profile test results for the soil removed from under the Electric Arc Furnace Baghouse Hazardous Waste Management Unit were determined to be nonhazardous by "TCLP" analysis and are included in attachment "C".

#### **ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

#### **CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW  
JW  
RML  
RBR

Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

Z 309 033 157

Ohio EPA  
Division of Solid and Hazardous Waste  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Z 309 033 158

Ohio EPA  
Supervisor, division of Solid and Infectious Waste Management  
Northeast District Office  
2110 East Aurora Road  
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Z 309 033 159

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Z 309 033 160

Mahoning County Health District  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty

Z 309 033 161

C:\WP51\HAZWASTE\USVAMSTD.TB3





JOHN OESCH  
PLANT MANAGER

# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 828-4550

FAX NO. (216) 821-4568

**RECEIVED**

JUL 6 1994

July 01, 1994

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Barbara Mazur

P 482 673 315

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

P 482 673 316

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 9**

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

RMT Engineering & Environmental Management performed the additional required background sampling on August 30, 1993.

On November 08, 1993, American Steel Foundries submitted a Background Sampling Analysis Plan for the Electric Furnace Baghouse Management Unit to the OEPA.

In a letter dated December 21, 1993, Mr. John Palmer, Environmental Specialist, OEPA, Northeast District Office instructed Mr. Terry Bradway, Environmental Manager, American Steel Foundries to apply for an extension to the (180) day limit requirement of the consent order because the Ohio EPA needed more time to complete their technical review of the Background Sampling Plan for the Electric Arc Furnace Baghouse Management Unit.

In a January 11, 1994 letter, ASF formally requested an extension to the closure limit of the Electric Arc Furnace Baghouse Closure Plan in accordance with the OEPA's directive.

The Ohio EPA granted the extension request on February 03, 1994 in Mr. Donald R. Schregardus's letter to Mr. Terry Bradway.

In a May 09, 1994 letter, Mr. Palmer listed OEPA's technical comments for the document titled Background Sampling and Analysis for Electric Arc Furnace Baghouse Hazardous Waste Management Unit.

Mr. John F. Oesch, Plant Manager, American Steel Foundries formally submitted his response to Mr. Palmer's technical comments in a June 10, 1994 letter.

Mr. Palmer acknowledged receipt of the June 10, 1994 response to comments in his June 15, 1994 letter.

We plan to close the Electric Arc Furnace Baghouse Waste Management Unit during our plant vacation shutdown in the first two weeks of August. However, we are currently awaiting Ohio EPA approval regarding our response to comments of June 10, 1994.

#### **E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

RMT Engineering and Environmental Management completed the first sampling of the landfill wells in accordance with the Groundwater Quality Assessment Plan during the week of December 13, 1993 and on February 23, 1994 results of the sampling were submitted to the U.S. EPA and Ohio EPA with our recommendations for parameters for the next three sampling events in accordance with the Consent Decree.

In a March 08, 1994 letter to Mr. Terry Bradway, Mr. John Palmer of the Ohio EPA acknowledged receipt of the test results.

Mr. John Palmer of the Ohio EPA approved our recommendations for the groundwater sampling parameters in a letter dated March 11, 1994.

Mr. Palmer's letter of March 11, 1994 also listed several additional comments relative to the groundwater monitoring program at the Sebring Facility.

In Mr. J.F.Oesch's letter of April 01, 1994, ASF responded to Mr. Palmer's March 11, 1994 comments.

In an April 29, 1994 letter, Mr. John Palmer agreed that ASF's response of April 01, 1994 had adequately addressed all issues of concern to the agency.

A third sampling of the groundwater monitoring wells was performed during the week of June 13, 1994. Those results have not been received to date.

RMT will be performing the fourth sampling of the monitoring wells the week of September 12, 1994.

#### **TEST RESULTS AND SAMPLING SUMMARY**

Our experiments to reduce lead and cadmium in EAF dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate. Its impact on our furnace operation is being evaluated.

American Waste and BFI have also sampled several waste streams during the previous period and test results have been received. See attachment "B"

Envirite Corp. is in process of recertification of our EAF Dust and Smoke Eater waste streams but retest results have not been received to date.

#### **ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

#### **CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW  
JW  
DJM  
RML  
RBR

Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

P 482 673 317

Ohio EPA  
Division of Solid and Hazardous Waste  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

P 482 673 318

Ohio EPA  
Supervisor, division of Solid and Infectious Waste Management  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

P 482 673 319

Edward J Brosius, ESQ.  
Amsted Industries, Inc.  
44th Floor - Boulevard Towers South  
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P. C. Schillawski  
Squire Sanders & Dempsey  
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127 Public Square  
Cleveland, Ohio 44114-1304

P 482 673 320

Mahoning County Health District  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty





JOHN OESCH  
PLANT MANAGER

# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 821-4568

FAX NO. (216) 821-4568

RECEIVED

APR 08 1994

April 01, 1994

OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Barbara Mazur

P 738 585 686

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

P 738 585 687

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

## **Progress Report # 8**

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

### **C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

RMT Engineering & Environmental Management performed the additional required background sampling on August 30, 1993.

In a letter dated November 08, 1993, American Steel Foundries submitted a Background Sampling Analysis Plan for the Electric Furnace Baghouse Management Unit to the EPA for their review and approval. A speedy approval was requested because American Steel Foundries was concerned that delays in approval and weather conditions could have adverse effects on our ability to complete closure of the Electric Arc Furnace Closure Plan within the specified (180) day limit of the consent order which expires on April 02, 1994.

In a letter dated December 21, 1993, Mr. John Palmer, Environmental Specialist, OEPA, Northeast District Office instructed Mr. Terry Bradway, Environmental Manager, American Steel Foundries to apply for an extension to the (180) day limit requirement of the consent order because the Ohio EPA needed more time to complete their technical review of the Background Sampling Plan for the Electric Arc Furnace Baghouse Management Unit.

In a January 11, 1994 letter, American Steel Foundries formally requested an extension to the closure limit of the Electric Arc Furnace Baghouse Closure Plan in accordance with the OEPA's directive.

The Ohio EPA granted the extension request on February 03, 1994 in Mr. Donald R. Schregardus's letter to Mr. Terry Bradway.

We have received competitive bids for the Electric Arc Furnace Closure Plan work and can award the contract. However, we are currently awaiting Ohio EPA approval of the Background Sampling Analysis Plan for Electric Furnace Baghouse Waste Management Unit.

#### **E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or



pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

RMT Engineering and Environmental Management completed the first sampling of the landfill wells in accordance with the Groundwater Quality Assessment Plan during the week of December 13, 1993 and on February 23, 1994 results of the sampling were submitted to the U.S. EPA and Ohio EPA with our recommendations for parameters for the next three sampling events in accordance with the Consent Decree.

In a March 08, 1994 letter to Mr. Terry Bradway, Mr. John Palmer of the Ohio EPA acknowledged receipt of the test results.

In a letter dated March 11, 1994, Mr. John Palmer of the Ohio EPA approved our recommendations for the groundwater sampling parameters.

Mr. Palmer's letter of March 11, 1994 also listed several additional comments relative to the groundwater monitoring program at the Sebring Facility. We are currently preparing our response to those comments and since they were not received in time for their incorporation into the sampling process prior to the second sampling, they were not totally included.

A second sampling of the groundwater monitoring wells was performed during the week of March 14, 1994. Those results have not been received to date.

RMT will be performing the third sampling of the monitoring wells the week of June 13, 1994.

## **TEST RESULTS AND SAMPLING SUMMARY**

Our experiments to reduce lead and cadmium in EAF dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. We are currently moving into the next phase of our CLEAN SCRAP EXPERIMENTS. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate in order to determine its impact on our furnace operation.

During this quarter several waste streams were recertified with BFI our waste hauler, see attachment "B". American Waste and BFI have also sampled several waste streams during this period but test results have not been received.

## **GENERAL**

Please note the following change:

On January 12, 1994 Mr. T.C. Bradway, American Steel Foundries, was instructed by Ms. Barbara Mazur, U.S. EPA, Region V to change certified letter routing in the Chief, RCRA Enforcement Branch from the attention of Mr. John Saric to the attention of Ms. Barbara Mazur.

## **ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

## **CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

*J. F. Oesch RBR*  
J. F. Oesch  
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: RSW  
DJM  
JW  
ERH  
RML  
RBR

Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

P 738 585 688

Ohio EPA  
Division of Solid and Hazardous Waste  
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P 738 585 689

Ohio EPA  
Supervisor, division of Solid and Infectious Waste Management  
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4900 Society Center,  
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P 738 585 691

Mahoning County Health District  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty





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# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601

(216) 823-6150 • FAX NO. (216) 821-4568

January 03, 1994

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JAN 11 1994

OFFICE OF RCRA  
WASTE MANAGEMENT  
DIVISION

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

✓ Chief RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 S. Dearborn St.  
Chicago, Illinois 60604  
Attention: James Saric

P 069 816 949

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

P 738 585 612

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 7**

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

RMT Engineering & Environmental Management performed the additional required background sampling on August 30, 1993.



On November 08, 1993, American Steel Foundries submitted a Background Sampling Analysis Plan for the Electric Furnace Baghouse Management Unit to the EPA for their review and approval. A speedy approval was requested because American Steel Foundries was concerned that delays in approval and weather conditions could have adverse effects on our ability to complete closure of the Electric Arc Furnace Closure Plan within the specified (180) day limit of the consent order which expires on April 02, 1994.

We have received competitive bids for the Electric Arc Furnace Closure Plan work and can award the contract. However, to date the Ohio EPA has not approved the Background Sampling Analysis Plan for Electric Furnace Baghouse Waste Management Unit and, without that approval, we cannot proceed.

On December 21, 1993, Mr. John Palmer, Environmental Specialist, Division of Hazardous Waste Management, Ohio EPA sent a letter to Mr. T.C. Bradway, Environmental Manager, American Steel Foundries. He suggested that American Steel Foundries apply for an Extension Request to the (180) day Limit of the consent order because the Ohio EPA needs several more weeks to complete their technical review of the Background Sampling Plan for the Electric Arc Furnace Baghouse Management Unit. (See Attachment "A") We are preparing to respond to that request.

#### **E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

In Mr. John Palmer's letter of October 13, 1993, The Ohio EPA formerly approved the Groundwater Quality Assessment Plan.





RMT Engineering and Environmental Management has been retained to implement the Groundwater Quality Assessment Plan. Drilling of the additional sampling wells was completed in November 1993 and the first sampling was completed the week of December 13, 1993. We have not received the sample test results from RMT to date.

RMT will be performing the next sampling of the monitoring wells the week of March 14, 1994.

#### **X. REPORTING**

C. One year after of this Decree, if the U.S. EPA agrees, Defendant may submit a Progress Report less frequently, but at least each calendar quarter. This paragraph is not subject to Section XVI (Dispute Resolution) or Section XV (Modification) of this Decree.

American Steel Foundries has worked diligently over the past year to comply with the Consent Decree Reporting Requirements and, unless directed otherwise by the U.S. EPA, will submit future reports on a quarterly basis with the next report due ten days after the quarter ending March 31, 1994. If this reporting schedule does not meet with U.S. EPA approval, please convey your requirements to the attention of Mr. T.C. Bradway, Environmental Manager, American Steel Foundries, 1001 E. Broadway St., Alliance, Ohio 44601.

#### **TEST RESULTS AND SAMPLING SUMMARY**

Our experiments to reduce lead and cadmium in EAF dust continue.

Attachment "B" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. During the past two months, we deviated from our CLEAN SCRAP EXPERIMENTS in order to clean our scrap bins and prepare for the next phase of our experiments. This explains Lead test result variations in the attached test reports.

#### **ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.



**CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

  
Yours very truly,

J. P. Oesch  
PLANT MANAGER

TCB



UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: CAR  
DJM  
VTH  
ERH  
RML  
RBR

Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
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Ohio EPA  
Division of Solid and Hazardous Waste  
Northeast District Office  
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Ohio EPA  
Supervisor, division of Solid and Infectious Waste Management  
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P 069 816 953

Mahoning County Health District  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty





JOHN OESCH  
PLANT MANAGER

# American Steel Foundries

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FAX NO. (216) 821-4568

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November 08, 1993

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 S. Dearborn St.  
Chicago, Illinois 60604  
Attention: James Saric

RECEIVED  
NOV 13 1993

OFFICE OF RCRA  
WASTE MANAGEMENT DIV.  
EPA REGION V

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Inclosed please find the Background Sampling Analysis for Electric Arc Furnace Baghouse Hazardous Waste Management Unit. This submittal is intended to meet the requirements of the Closure Plan for the Electric Arc Furnace Baghouse Hazardous Waste Management Unit, Appendix "D" as amended in Mr. D.R. Schregardus's Ohio EPA letter dated October 04, 1993.

We respectfully request rapid approval from the OEPA in order to complete the project this fall. If delays in approval are encountered we may not be able to meet the (180) day closure requirement. The primary cause will be our ability to complete the work in cold weather. We thank you in advance for your early consideration of our request.

**CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

TCB





UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: CAR  
DJM  
VTH  
ERH  
RML  
RBR

Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

Ohio EPA  
Division of Solid and Hazardous Waste  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Ohio EPA  
Supervisor, division of Solid and Infectious Waste Management  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

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Squire Sanders & Dempsey  
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Cleveland, Ohio 44114-1304

Mahoning County Health District  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty





JOHN OESCH  
PLANT MANAGER

# American Steel Foundries

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FAX NO. (216) 821-4568

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NOV 18 1993

November 04, 1993

OFFICE OF RCRA  
WASTE MANAGEMENT  
EPA REGION V

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 S. Dearborn St.  
Chicago, Illinois 60604  
Attention: James Saric

P 329 880 557

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

P 329 880 558

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.**  
**CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 6**

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

On August 05, 1993, American Steel Foundries received approval for the Electric Arc Furnace Closure Plan.



RMT Engineering & Environmental Management performed the additional required background sampling on August 30, 1993.

On October 06, 1993, American Steel Foundries received a letter from the Ohio EPA revoking their August approval for the Electric Arc Furnace Closure Plan. The letter also contained a second approval for the Electric Arc Furnace Closure Plan with additional editorial changes. See attachment "A"

RMT Engineering & Environmental Management has been retained to provide "RCRA Closure Observation and Documentation" for the Electric Arc Furnace Closure Plan activities. They will also provide the "Certification Report" upon completion of the project.

We have received competitive bids for the physical closure work and will award the contract shortly.

#### **E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

In Mr. John Palmer's letter of October 13, 1993, The Ohio EPA formerly approved the Groundwater Quality Assessment Plan.

RMT Engineering and Environmental Management has retained to implement the Groundwater Quality Assessment Plan. Drilling of the wells will start shortly and we anticipate to be sampling the week of December 13, 1993.



## **TEST RESULTS AND SAMPLING SUMMARY**

Our experiments to reduce lead and cadmium in EAF dust continue.

On October 5, 1993 a report titled "ELECTRIC ARC FURNACE DUST CLEAN SCRAP EXPERIMENTS" was submitted to Mr. J.F. Oesch, Plant Manager. It detailed the progress to date and summarized the test results. The Cadmium average at that point was 1.99 mg/L and Lead was at 1.57 mg/L. See Attachment "B".

Attachment "C" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. During early October, we experienced a shortage of purchased scrap and were forced to deviate from our CLEAN SCRAP EXPERIMENTS. This explains a 15.3 mg/L Lead test result is on the October 14, 1993 report.

Four alternate waste streams were evaluated during the last reporting period. The materials were from renovations projects and the residues from in plant nonreportable material spills. All were nonhazardous solids and authorization has been received from Browning Ferris Industries to dispose of these materials at their landfills. See attachment "D".

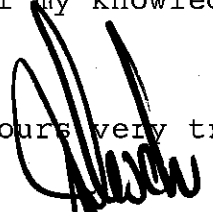
## **ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

## **CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

TCB





UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: CAR  
DJM  
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RML  
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Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
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**P 329 880 560**

Ohio EPA  
Supervisor, division of Solid and Infectious Waste Management  
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Chief, Solid Waste Program  
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State of Ohio Environmental Protection Agency

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Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

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10/6/93  
ICB

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

October 4, 1993

RE: CLOSURE PLAN  
AMERICAN STEEL FOUNDRIES  
EAF BAGHOUSE AREA  
OHD 981-090-418

CERTIFIED MAIL

Mr. T. C. Bradway  
American Steel Foundries  
1001 East Broadway  
Alliance, OH 44601

Dear Mr. Bradway:

On January 29, 1993, American Steel Foundries submitted to Ohio EPA a closure plan for the EAF baghouse dust storage unit located at 1001 East Broadway, Alliance, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that American Steel Foundries' proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of American Steel Foundries in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

On August 3, 1993, Ohio EPA issued a conditional approval for this closure plan. This August 3, 1993 conditional approval contained typographical errors, and is hereby revoked. This closure plan approval supersedes the prior closure plan approval.

Based upon review of American Steel Foundries' submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at 1001 East Broadway, as modified herein, meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA on January 29, 1993 and revised on June 7, 1993, is hereby approved with the following modifications:

Section 3.3, Page 14: The Revised Closure Plan is hereby amended to incorporate the following statement at the end of the second full paragraph on this page: "If the calculated UCL for lead exceeds 150 mg/kg, the clean standard for lead shall be 150 mg/kg."

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Nike Mackey Date 10/4/93



I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

Mr. T. C. Bradway  
American Steel Foundries  
Page Two

By: Mike Mearney Date 10/4/93

OHIO EPA  
OCT - 4 93  
STATE DIRECTOR'S JOURNAL

Section 3.3, Page 14: The Revised Closure Plan contained the statement: "The tests which are to be used to determine this will be either the Shapiro-Wilk Test, or the Kolmagarov-Smirnov Test with Lillefors critical values."

The Revised Closure Plan is hereby modified to read: "The tests which are to be used to determine this will be either the Shapiro-Wilk Test, or the Kolmogorov-Smirnov Test with Lilliefors critical values."

Appendix D: American Steel Foundries shall perform additional sampling, analysis and calculation activities in order to determine site specific clean standards based on background UCLs. The data presented in this appendix is no longer relevant. Therefore, the Revised Closure Plan is hereby modified to delete Appendix D. The data and calculations used to derive the clean standards shall be submitted with the closure certification documentation. American Steel Foundries is advised to submit this information to the Ohio EPA for review prior to initiating remediation activities.

Appendix F: The Revised Closure Plan contains the statement: "Wash with a nitric acid rinse."

The Revised Closure Plan is hereby modified to read: "Wash with a dilute nitric acid rinse."

Please be advised that approval of this closure plan does not release American Steel Foundries from any responsibilities as required under Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination, or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Subchapter 9601 et seq, as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499



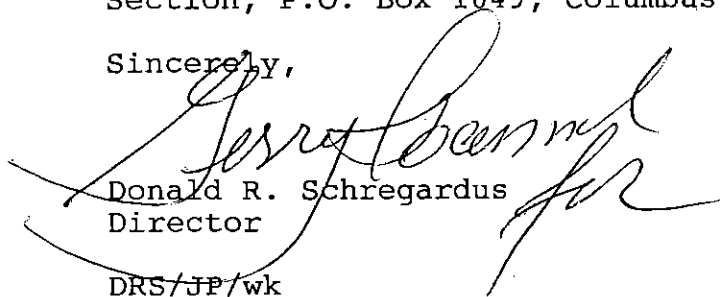
Mr. T. C. Bradway  
American Steel Foundries  
Page Three

("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of, and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,

  
Donald R. Schregardus  
Director

DRS/JP/wk

cc: Tom Crepeau, DHWM Central File, Ohio EPA  
Randy Meyer, Ohio EPA, DHWM, CO  
Section Chief, Ohio Permit Section, U.S. EPA - Region V  
John Palmer, Ohio EPA, DHWM, NEDO  
Harry Courtright, Ohio EPA, DHWM, NEDO

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: W. Mackey Date 10/4/93

OHIO EPA.  
OCT-4 93  
DIRECTOR'S JOURNAL







# American Steel Foundries

1001 EAST BROADWAY • P. O. BOX 2060 • ALLIANCE, OHIO 44601

(216) 823-6150 • FAX NO. (216) 821-4568

October 5 1993

Mr. J.F.Oesch  
Plant Manager

**SUBJECT: ELECTRIC ARC FURNACE DUST**  
**CLEAN SCRAP EXPERIMENTS**

We have been continually monitoring electric arc furnace dust with (TCLP) Toxicity Characteristic Leaching Procedure testing for metals only since January 1993. This is the very test that the Environmental Protection Agency would use to determine if our dust is a hazardous waste. The waste is tested for leachable amounts of the following heavy metals:

<u>METAL</u>	<u>REGULATORY LIMIT</u>	<u>ASF AV. TEST RESULT</u>
Arsenic	5 mg/L	none detected
Barium	100 mg/L	none detected
*Cadmium	1 mg/L	1.99 mg/L
Chromium	5 mg/L	0.25 mg/L
*Lead	5 mg/L	1.57 mg/L
Mercury	0.2 mg/L	none detected
Selenium	1 mg/L	0.07 mg/L
Silver	5 mg/L	none detected

\* = Metals reported hazardous on at least one test.  
1 mg/L = 1/1,000,000 or .000,001 part of the total.

Lead and Cadmium are the two heavy metals of concern with our electric arc dust. Since the testing of arc furnace dust began last fall, a total of fifteen tests have been conducted. All six of the other heavy metals have consistently tested well below regulatory limits. Therefore, the remainder of this report will deal exclusively with the Lead and Cadmium.



Listed below are the two metals of concern with a brief summary of the test data:

#### CADMIUM

The regulatory limit for Cadmium is 1 mg/L and it is the most difficult of the limits for us to meet. Our range for Cadmium over the test period has been from "0" or none detected to a maximum of 7.8 and our average is 1.99 mg/L. We are currently averaging 67% of the loads tested above the regulatory limit or in the hazardous range.

#### LEAD

Lead currently presents less of a problem to us than Cadmium. Lead's regulatory limit is 5 mg/L. and is much higher than the limit for Cadmium. Our range for Lead over the test period has been from "0" or none detected to a maximum of 5.9 and our average is 1.57 mg/L. We have had only one load that has tested hazardous for Lead

There are many factors that are influencing the test results and each is contributing to the success of the "CLEAN SCRAP EXPERIMENTS". Ultimately, our goal would be to have all Electric Arc Furnace Dust test nonhazardous. This is ambitious, but may be achievable. To date we have substantially reduced the leachable levels of Cadmium and lead. The known factors that have contributed to the success of the program are as follows:

#### FRAG-SCRAP

This material is produced by shredding automobile bodies. It contains a variety of undesired elements including lead and cadmium, not to mention other nonferrous metals. The lead comes from body lead and solder. Cadmium is used as a protective coating and is somewhat lustrous. It is used on various components including: bumpers, nuts, bolts, etc;.

Since we removed this type of scrap from our furnace charge, the amounts of lead and cadmium in the furnace dust have been reduced.



### PAINTED SCRAP

Old structural scrap from bridges and buildings that had been painted can contribute to lead contamination. Lead base paints contained lead oxide in their pigments and they were extensively used as a rust inhibitor in the past. By eliminating painted scrap, lead contamination of our dust can be reduced.

### SHOP SCRAP

In a continuing effort to track down all potential sources of Cadmium, Lead and other undesirable materials, we are instituting a new program at this facility. All shop scrap, including that generated by our Maintenance Department, will be evaluated by Mr. Benton before it is taken to the Melted Metals Department. Any steel scrap that may have a questionable chemistry or suspect surface coating will be sold to a scrap dealer. We are also putting considerable effort into separating our own poured steel scrap by grades so that our product steel quality can be more easily controlled.

### PH FACTOR OF TESTING

There appears to be a direct correlation between final PH levels above 7 and leachable concentrations of heavy metals found in our dust. In most cases, when PH levels are between 7 and 7.3, better test results can be achieved. Therefore, we are evaluating the concentrations of materials normally found in our melting operation, such as basic metal oxides and lime additions in our furnace operation that can have a direct impact on final PH of the dust.

### DISPOSAL OF DUST

We have approached Envirite Corporation, our handler of this dust, and have reached a new agreement with them. The new contract provides for testing of every load of dust. Based on the test results, the dust will be either processed as a hazardous waste through Envirite Corporation or taken to their subsidiary, County Environmental, and landfilled as a nonhazardous waste. Our disposal costs should be reduced by approximately \$15,000 in 1994, based on current test results.



8

This program will also demonstrate through documentation to the EPA that we are actively pursuing the reduction of hazardous waste generation at this facility.

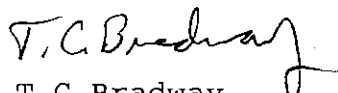
### CONCLUSIONS

It is apparent that the hazardous components of electric furnace dust can be substantially reduced and controlled through our "CLEAN SCRAP EXPERIMENTS" program. Cadmium and Lead can both be reduced to an average of less than 2 mg/L. We have proven that lead can be controlled to below regulatory limits in all but one of our tests. Cadmium, however, is our principal problem with a regulatory limit of 1 mg/L. We are focusing on the Cadmium challenge and will continue our efforts to eliminate this problem.

Very truly yours

  
T.J. Benton

Chief Metallurgist



T.C. Bradway  
Environmental Manager

cc:RML  
DJM  
CAR

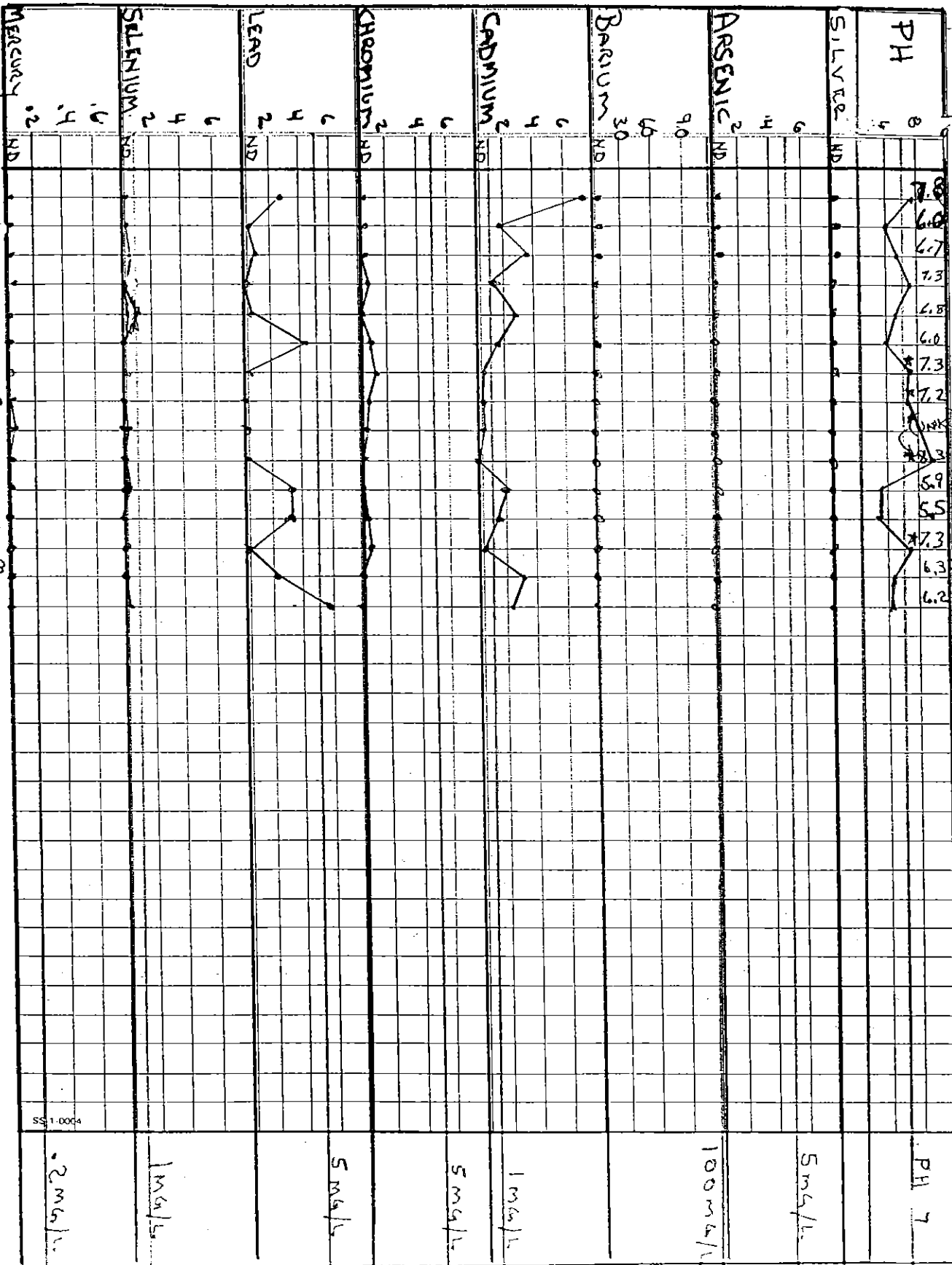




ELEMENT Mg/L

# TEST RESULTS ERF COLLECTION

REG  
LIMITS



SS 1-0004

2 mg/L

1 mg/L

5 mg/L

5 mg/L

1 mg/L

100 mg/L

5 mg/L

PH 7



# TEST RESULTS FROM EAF COLLECTOR

TEST  
DATES

	SILVER	ARSENIC	BARIUM	CADMIUM	CHROMIUM	LEAD	SELENIUM	MERCURY	REG Limit
	5	5	100	1	5	5	1	.2	
9-1-92	ND	ND	ND	7.8	ND	2.7	ND	ND	1
9-18-92	ND	ND	ND	1.7	ND	ND	ND	ND	2
10-15-92	ND	ND	ND	3.7	ND	0.9	0.3	ND	3
1-20-93	ND	ND	ND	1.3	0.7	ND	ND	ND	4
2-4-93	ND	ND	ND	2.7	ND	0.3	ND	ND	5
2-23-93	ND	ND	ND	1.6	0.7	4.4	ND	ND	6
3-16-93	ND	ND	ND	0.5	0.7	ND	ND	ND	7
3-31-93	ND	ND	ND	0.44	0.59	ND	ND	ND	8
4-28-93	ND	ND	ND	0.59	0.41	ND	0.1	0.02	9
4-28-93	ND	ND	ND	ND	ND	ND	ND	ND	10
5-14-93	ND	ND	ND	2.0	ND	3.8	0.33	ND	11
6-17-93	ND	ND	ND	1.4	0.16	3.5	ND	ND	12
7-20-93	ND	ND	ND	0.46	0.54	ND	ND	ND	13
8-23-93	ND	ND	ND	3.2	ND	2.1	ND	ND	14
9-13-93	ND	ND	ND	2.4	ND	5.9	0.35	ND	15

NOTE: 1. ND = NONE DETECTED

2. ALL READINGS ARE IN MG/L



# ATTACHMENT "C"

## AMERICAN STEEL FOUNDRIES

101493AA EAF FURNACE DUST 10-14-93

WO #: G7044  
LAB #: A3J140041-001  
MATRIX: SOLID

DATE SAMPLED: 10/14/93  
DATE RECEIVED: 10/14/93  
TCLP EXTRACTION DATE: 10/18/93  
FINAL PH: 6.8

- - - - - TCLP TOXICITY CHARACTERISTIC METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching  
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	10/18-10/20/93	3291071
Arsenic	ND	0.50	mg/L	SW846 6010	10/18-10/20/93	3291071
Barium	ND	1.0	mg/L	SW846 6010	10/18-10/20/93	3291071
Cadmium	2.1	0.10	mg/L	SW846 6010	10/18-10/20/93	3291071
Chromium	ND	0.10	mg/L	SW846 6010	10/18-10/20/93	3291071
Lead	15.3	0.10	mg/L	SW846 6010	10/18-10/20/93	3291071
Selenium	ND	0.30	mg/L	SW846 6010	10/18-10/20/93	3291071
Mercury	ND	0.020	mg/L	SW846 7471	10/18-10/19/93	3291071

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT









## AMERICAN STEEL FOUNDRIES

093093A EAF FURNACE DUST 9-30-93 2:30 PM

WO #: G3679  
 LAB #: A3J010031-001  
 MATRIX: SOLID

DATE SAMPLED: 9/30/93  
 DATE RECEIVED: 10/01/93  
 TCLP EXTRACTION DATE: 10/05/93  
 FINAL PH: 7.2

- - - - - TCLP TOXICITY CHARACTERISTIC METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching  
 Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	10/05-10/13/93	3278054
Arsenic	ND	0.50	mg/L	SW846 6010	10/05-10/13/93	3278054
Barium	ND	1.0	mg/L	SW846 6010	10/05-10/13/93	3278054
Cadmium	1.4	0.10	mg/L	SW846 6010	10/05-10/13/93	3278054
Chromium	ND	0.10	mg/L	SW846 6010	10/05-10/13/93	3278054
Lead	1.9	0.10	mg/L	SW846 6010	10/05-10/13/93	3278054
Selenium	ND	0.30	mg/L	SW846 6010	10/05-10/13/93	3278054
Mercury	ND	0.020	mg/L	SW846 7471	10/05-10/06/93	3278054

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT



س

### Chain-of Custody Record

Division of Enseco Incorporated  
4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720  
(216) 497-9396 FAX (216) 497-0772

№ 28636

[illegible]



AMERICAN STEEL FOUNDRIES

091393A EAF FURNACE DUST 9-13-93 2:30PM

WO #: F9857  
LAB #: A3I160007-001  
MATRIX: SOLID

DATE RECEIVED: 9/16/93  
TCLP EXTRACTION DATE: 9/17/93  
FINAL PH: 6.2

TCLP TOXICITY CHARACTERISTIC METALS

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching  
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	9/17- 9/30/93	3260102
Arsenic	ND	0.50	mg/L	SW846 6010	9/17- 9/30/93	3260102
Barium	ND	1.0	mg/L	SW846 6010	9/17- 9/30/93	3260102
Cadmium	2.4	0.10	mg/L	SW846 6010	9/17- 9/30/93	3260102
Chromium	ND	0.10	mg/L	SW846 6010	9/17- 9/30/93	3260102
Lead	5.9	0.10	mg/L	SW846 6010	9/17- 9/30/93	3260102
Selenium	0.35	0.30	mg/L	SW846 6010	9/17- 9/30/93	3260102
Mercury	ND	0.020	mg/L	SW846 7471	9/17- 9/24/93	3260102

NOTE:

AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT



CLIENT CODE \_\_\_\_\_

QUOTE / SAR NUMBER \_\_\_\_\_

### Chain-of Custody Record

**WADSWORTH/ALERT Laboratories**

Division of Enseco Incorporated  
4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720  
(216) 497-9396 FAX (216) 497-0772

**№ 28635**

[illegible]





AMERICAN STEEL FOUNDRIES

082393A EAF FURNACE DUST 8-23-93 3:30PM

WO #: F7007  
LAB #: A3I020014-001  
MATRIX: SOLID

DATE RECEIVED: 9/02/93  
TCLP EXTRACTION DATE: 9/03/93  
FINAL PH:6.3

----- TCLP TOXICITY CHARACTERISTIC METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching  
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	9/03- 9/07/93	3246068
Arsenic	ND	0.50	mg/L	SW846 6010	9/03- 9/07/93	3246068
Barium	ND	1.0	mg/L	SW846 6010	9/03- 9/07/93	3246068
Cadmium	3.2	0.10	mg/L	SW846 6010	9/03- 9/07/93	3246068
Chromium	ND	0.10	mg/L	SW846 6010	9/03- 9/07/93	3246068
Lead	2.1	0.10	mg/L	SW846 6010	9/03- 9/07/93	3246068
Selenium	ND	0.30	mg/L	SW846 6010	9/03- 9/07/93	3246068
Mercury	ND	0.020	mg/L	SW846 7471	9/03- 9/16/93	3246068

NOTE:

AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT



CLIENT CODE \_\_\_\_\_

QUOTE / SAR NUMBER \_\_\_\_\_

### Chain-of Custody Record

**WADSWORTH/ALERT Laboratories**

Division of Enesco Incorporated  
4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720  
(216) 497-9396 FAX (216) 497-0772

**№ 28633**

[illegible]





**Waste Systems™**

BROWNING-FERRIS INDUSTRIES

ATTACHMENT 'D'

OK Willow Creek PM 9:30-93 OH 855, 219, 218 940928 209876  
WCD No. AA 92601  
BFI WASTE CODE

### WASTE EVALUATION REQUEST

BFI to complete this area

BFI Initiator Al Caserta  
Location Atwater OH  
Company Number 219 Date 9-17-93  
Telephone Number (216) 947-2548  
Action Requested: ☒ New Waste Approval  
☐ Up-Date Approval ☐ Priority  
☐ Other

Previous Laboratory Number \_\_\_\_\_  
Management Method Requested: ☒ Landfill ☐ Hauling  
☐ Other \_\_\_\_\_  
Disposal Site Requested 218-219-855  
Company Number 219 P.O. Number \_\_\_\_\_  
Analyses Requested: ☐ TCLP ☐ RCI  
☒ Other Waste in  
Analyses To Follow ☒ TCLP ☐ Other Waste in

### WASTE CHARACTERIZATION DATA

#### Special Waste

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

#### 1. GENERATOR INFORMATION

a) Generator's Name: American Steel Foundries  
b) Generating Facility Address: 1001 E Broadway  
City: Alliance State: OH Zip: 44601  
c) Company Representative: T.C. Broadway  
Title: Env Mgr  
d) Emergency Contact: Same  
Title \_\_\_\_\_  
e) Local Registration No. \_\_\_\_\_  
Generator's EPA Id. No. OH0981090418  
f) Telephone No. (216) 823-6150  
After Hours No. ( " ) \_\_\_\_\_  
Emergency No. ( " ) \_\_\_\_\_

#### 2. GENERAL WASTE STREAM INFORMATION

a) Description of The Waste: Concrete ASPHALT and Soil From PLANT FLOOR Removal (POSSIBLE Floor Sweepings OH/219/940212/202143) From STEEL Foundry  
b) Process Generating Waste: Removal of Floor Inside Plant For Resurfacing  
c) Is this a treatment residue of a waste which was previously a restricted characteristically hazardous waste? ☐ Yes ☒ No  
d) Is this a "Hazardous Waste" as defined by State or local Regulations? ☐ Yes ☒ No  
If yes, enter the Waste Identification Number if one has been assigned: \_\_\_\_\_  
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State or local Regulations?  
☒ Yes ☐ No If yes, enter Waste Identification Number: NA  
f) Recommended personal protection equipment and special handling procedures: NONE  
g) Anticipated Volume: 200 To 300 ☐ Gallons ☒ Tons ☐ Cubic Yards ☐ Other \_\_\_\_\_  
Per: ☐ Day ☐ Week ☐ Month ☒ Year ☐ One Time, or ☐ Other \_\_\_\_\_  
To be transported in: ☒ Bulk ☐ Drums (type/size) \_\_\_\_\_ ☐ Other \_\_\_\_\_  
h) Is a representative sample included? ☒ Yes ☐ No - If yes, complete the RSC found on the reverse side.

#### 3. WASTE PROPERTIES @ 72°F

a) Physical State:  
☒ Solid ☐ Semi-solid  
☐ Powder ☐ Liquid  
☐ Combination \_\_\_\_\_  
b) Odor:  
Describe \_\_\_\_\_  
☒ None ☐ Mild ☐ Strong  
c) Flash Point, °F:  
☐ ≤72 ☐ 73-100 ☐ 101-140  
☐ 141-200 ☐ ≥201 ☐ N/A ☒ N/D  
d) Layers:  
☒ Single Phase ☐ Bi-layered ☐ Multi-layered  
e) Density Range: \_\_\_\_\_ to \_\_\_\_\_  
☒ N/D ☐ lbs./gal. ☐ g/cc.  
☐ lbs./yd.<sup>3</sup> ☐ Other \_\_\_\_\_  
f) Color(s):  
Describe GRAY BROWN AND BLACK  
g) pH:  
☐ ≤2.0 ☐ 2.1-5.0 ☐ 5.1-9.0  
☐ 9.1-12.4 ☐ ≥12.5 ☐ N/A ☒ N/D

#### 4. REACTIVITY

Note if the waste exhibits any of the following reactive properties: ☐ Water Reactive ☐ Alkaline Reactive ☐ Pyrophoric ☐ Thermally Sensitive  
☐ Acid Reactive ☐ Autopolymerizable ☐ Explosive ☐ Shock Sensitive ☒ None of the above



CORPORATE WASTE  
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 09/28/93  
BFI Location : WILLOWCREEK LF  
BFI Initiator : CASANTA, A.  
Generator : AMERICAN STEEL FOUNDRIES  
Generator Location : ALLIANCE, OH  
Waste Description : CONCRETE, ASPHALT AND SOIL  
BFI Lab Number : 209872

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial: Amount of Original Waste 100% by vol.

Sanitary.. BFI Mahoning, Willowcreek, & Lorain County

Comments:

See the attached analytical data from DeYor Laboratories as received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation is based upon a review of the information provided by the generator. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code:

OH/SES:219/218/940928/209872

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco  
Technical Representative







CORPORATE WASTE  
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 02/12/93  
BFI Location : WILLOWCREEK  
BFI Initiator : CASANTA, A.  
Generator : AMERICAN STEEL FOUNDRIES  
Generator Location : ALLIANCE, OH  
Waste Description : FLOOR SWEEPINGS  
BFI Lab Number : 202143

### PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

#### RECOMMENDED:

Direct Landfill Burial: Amount of Original Waste 100% by vol.

Sanitary... BFI Mahoning & Willowcreek

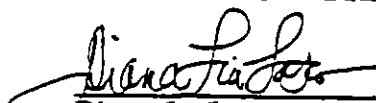
\*\* See attached analysis

#### Comments:

See the attached Chains (2) of Custody and analytical data from the BFI Houston Laboratory as received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation is based upon a review of the information provided by the generator. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: 01/855:219/940212/202143

CORPORATE WASTE APPROVAL GROUP

  
Diana L. Lasco  
Technical Representative



D-3  
WCD#AA73899 FLOOR SHEEPINGS

SPECIMEN I.D. NUMBER  
93516210  
ACCESSION NO.  
93 516210

COLLECTION DATE  
02/02/93  
CLIENT I.D. NUMBER LOCATION  
6210 00000  
COLLECTION TIME  
10:00  
RECEIVED  
02/03/93  
REPORTED  
02/11/93

AMERICAN STEEL

TEST	RESULT		REFERENCE OR THERAPEUTIC RANGE		UNITS
	NORMAL	ABNORMAL			
TCLP EXTRACTION PROC	FINAL pH=5.23				
TCLP METALS & BIAS %					
ARSENIC	<0.20		0.0	5.0	MG/L
Spike recovery	99				%
BARIUM	<0.50		0.0	100.0	MG/L
Spike recovery	81				%
CADMIUM	<0.03		0.0	1.0	MG/L
Spike recovery	104				%
CHROMIUM	<0.30		0.0	5.0	MG/L
Spike recovery	99				%
SELENIUM	<0.02		0.0	1.0	MG/L
Spike recovery	87				%
MERCURY	<0.0002		0.0	0.2	MG/L
Spike recovery	97				%
LEAD	<0.20		0.0	5.0	MG/L
Spike recovery	100				%
SILVER	<0.05		0.0	5.0	MG/L
Spike recovery	87				%
TCLP SUPPL. METALS					
NICKEL	0.37				MG/L
Spike recovery	99				%
COPPER	<0.30				MG/L
Spike recovery	104				%
TCLP REVIEW					

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846  
AS REVISED NOVEMBER 24, 1992 (37FR53114)  
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

DIRECTORS  
Patrick K. Jaynes Ph.D.  
Anthony Nasrallah Ph.D.

**DEYOR**  
Laboratories

7 Market Street, Suite 2500  
Youngstown, Ohio 44512  
(216) 758-5788  
(800) 365-3396

BFI WASTE SYSTEMS  
WILLOWCREEK LANDFILL DISTRICT  
1043 STATE ROUTE 225  
ATWATER OH 44201



BRICKTON OH 43001  
CHARGE ONLY  
WCD No. AA 92599  
OH 218-219-855 940902 20973  
BFI WASTE CODE

WASTE EVALUATION REQUEST

BFI to complete this area.

BFI Initiator AT/Inmate  
Location ATWATER, OH  
Company Number 219 Date 9-17-93  
Telephone Number (216) 547-2548  
Action Requested: ☒ New Waste Approval  
☐ Up-Date Approval ☐ Priority  
☐ Other

Previous Laboratory Number \_\_\_\_\_  
Management Method Requested: ☒ Landfill ☐ Hauling  
☐ Other \_\_\_\_\_  
Disposal Site Requested 218-219-855  
Company Number 219 P.O. Number \_\_\_\_\_  
Analyses Requested: ☐ TCLP ☐ RCI  
☐ Other GLUTE  
Analyses To Follow: ☒ TCLP ☐ Other ATTACHED

WASTE CHARACTERIZATION DATA

Special Waste

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES  
b) Generating Facility Address: 1001 E. BROADWAY  
City: AL LAMAR State: OH Zip: 44601  
c) Company Representative: T.C. BROADWAY  
Title: ENVIRONMENTAL MANAGER  
d) Emergency Contact: AS ABOVE  
Title: \_\_\_\_\_  
e) Local Registration No. \_\_\_\_\_  
Generator's EPA Id. No. 940981090418  
f) Telephone No. ( 216 ) 833-6150  
After Hours No. ( 216 ) 833-6150  
Emergency No. ( 216 ) 833-6150

2. GENERAL WASTE STREAM INFORMATION

a) Description of The Waste: SOIL FROM REMOVAL OF UNDERGROUND STORAGE TANK THAT CONTAINS ISOPROPOL ALCOHOL FROM STEEL FOUNDRY  
b) Process Generating Waste: REMOVAL OF UST SUBJECT TO CORRECTIVE ACTION 40 CFR 280  
c) Is this a treatment residue of a waste which was previously a restricted characteristically hazardous waste? ☐ Yes ☒ No  
d) Is this a "Hazardous Waste" as defined by State or local Regulations? ☐ Yes ☒ No  
If yes, enter the Waste Identification Number if one has been assigned: \_\_\_\_\_  
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State or local Regulations?  
☒ Yes ☐ No If yes, enter Waste Identification Number: NA  
f) Recommended personal protection equipment and special handling procedures: NA  
g) Anticipated Volume: 20 TO 30 TONS ☐ Gallons ☒ Tons ☐ Cubic Yards ☐ Other \_\_\_\_\_  
Per: ☐ Day ☐ Week ☐ Month ☐ Year ☒ One Time, or ☐ Other \_\_\_\_\_  
To be transported in: ☒ Bulk ☐ Drums (type/size) \_\_\_\_\_ ☐ Other \_\_\_\_\_  
h) Is a representative sample included? ☒ Yes ☐ No - If yes, complete the RSC found on the reverse side.

3. WASTE PROPERTIES @ 72°F

a) Physical State:  
☒ Solid ☐ Semi-solid  
☐ Powder ☐ Liquid  
☐ Combination \_\_\_\_\_  
b) Odor:  
Describe \_\_\_\_\_  
☒ None ☐ Mild ☐ Strong  
c) Flash Point, °F:  
☐ ≤ 72 ☐ 73-100 ☐ 101-140  
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D  
d) Layers:  
☒ Single Phase ☐ Bi-layered ☐ Multi-layered  
e) Density Range: \_\_\_\_\_ to \_\_\_\_\_  
☒ N/D ☐ lbs./gal. ☐ g/cc  
☐ lbs./yd.<sup>3</sup> ☐ Other \_\_\_\_\_  
f) Color(s):  
Describe BROWN + BLACK  
g) pH:  
☐ ≤ 2.0 ☐ 2.1-5.0 ☐ 5.1-9.0  
☐ 9.1-12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

4. REACTIVITY

Note if the waste exhibits any of the following reactive properties:  
☐ Water Reactive ☐ Alkaline Reactive ☐ Pyrophoric ☐ Thermally Sensitive  
☐ Acid Reactive ☐ Autopolymerizable ☐ Explosive ☐ Shock Sensitive ☒ None of the above



## BFI WASTE CODE

## 5. THIS WASTE CONTAINS

Note if the waste contains any of the following:

- |                                       |  |   |  |
|---------------------------------------|--|---|--|
| <input type="checkbox"/> Free Liquids | <input type="checkbox"/> Dioxins                     | <input type="checkbox"/> Etiological Agents   | <input type="checkbox"/> Radioactive Materials                 |
| <input type="checkbox"/> Free Cyanide | <input checked="" type="checkbox"/> Organic Solvents | <input type="checkbox"/> Pathogens            | <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 |
| <input type="checkbox"/> Free Sulfide | <input type="checkbox"/> Used Oils                   | <input type="checkbox"/> OSHA Substances      | <input type="checkbox"/> None of the above                     |
| <input type="checkbox"/> Free Ammonia | <input type="checkbox"/> Virgin Oils                 | <input type="checkbox"/> Biological Materials |  |

If any of the above are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.

## 6. COMPLETE WASTE COMPOSITION

Concentration ranges are suggested, but total must equal 100%. Units must be identified and are to be in parts per million (ppm) and/or percentages (%). Attach additional pages if necessary.

Components	Range Min. / Max.	Components	Range Min. / Max.
SOIL	89.99		
CONCRETE	10		
ALCOHOL	01		

## 7. TRANSPORTATION INFORMATION

If the waste is a DOT Hazardous Material, complete the following:

Proper USDOT Shipping Name: NONE

USDOT Hazard Class: \_\_\_\_\_ UN or NA Number: \_\_\_\_\_ CERCLA Reportable Quantity: \_\_\_\_\_

## 8. SUPPLEMENTAL INFORMATION

- ☐ None      ☒ MSD Sheets      ☐ Analytical Data      ☐ Memo/Letter      ☐ Waste Composition  
☐ Other - describe \_\_\_\_\_ No. of Pages \_\_\_\_\_

## 9. GENERATOR'S CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exists, that all known or suspected hazards have been disclosed, and that the waste is not designated a Hazardous Waste by the USEPA or contains PCBs regulated by TSCA 40 CFR 761.

GENERATOR'S AUTHORIZED SIGNATORY:

9/14/93 DATE      T.C. Beasow PRINT NAME      T.C. Beasow SIGNATURE      Environmental Manager TITLE      PCB INITIALS

## REPRESENTATIVE SAMPLE CERTIFICATE

This Section is to be completed by the person obtaining the sample of the above described waste, preferably a representative of the generator. DO NOT COLLECT OR SUBMIT SAMPLES THAT ARE RADIOACTIVE, SHOCK SENSITIVE, EXPLOSIVE, OR PYROPHORIC.

I certify that the sample identified below that is being forwarded to BFI for evaluation is representative of the waste described above. I also understand that, should the waste material described herein not be acceptable for management by BFI Waste Systems, the sample(s) may be returned to the generator.

Collector's Name: T.C. Beasow

(Print Off Label)

Signature: T.C. Beasow

Generator's Name: \_\_\_\_\_

Company: American Steel Foundries

Waste Description: \_\_\_\_\_

Title: Environmental Manager

Date Collected: \_\_\_\_\_ WCD No. AA 02500

Telephone Number: (214) 823-6150

Date at BFI Lab: \_\_\_\_\_ BFI Lab No. \_\_\_\_\_





CORPORATE WASTE  
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 09/22/93  
BFI Location : WILLOWCREEK, LE  
BFI Initiator : CASANTA, A.  
Generator : AMERICAN STEEL FOUNDRIES  
Generator Location : ALLIANCE, OH  
Waste Description : SOIL W/ISOPROPOL ALCOHOL  
BFI Lab Number : 209732

PRETREATMENT & DISPOSAL RECOMMENDATIONSafety Precautions : Avoid Skin & Eye ContactRECOMMENDED:Direct Landfill Burial: Amount of Original Waste 100% by vol.Sanitary.. BFI Mahoning Willowcreek, & Lorain CountyComments:

Approved for time only disposal. See the attached Chain of Custody and analytical data from DeVor Laboratories as received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation is based upon a review of the information provided by the generator. This recommendation is contingent upon the receipt at treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: 09/855;219;213/940922/209732

CORPORATE WASTE APPROVAL GROUP

  
Diana Lasco  
Technical Representative



WCD#AA92599 SOIL W/ ALCOHOL

SPECIMEN I.D. NUMBER

93627289

ACCESSION NO.

93 627289

COLLECTION DATE

08/26/93

CLIENT I.D. NUMBER LOCATION

7289

COLLECTION TIME

00:00

RECEIVED

09/01/93  
REPORTED

AMERICAN STEEL

00000

09/09/93

TEST	RESULT	REFERENCE OR THERAPEUTIC RANGE	UNITS
BFI UST PANEL	1890		PPM
TOT. PETRO. HYDROCARB.	ANALYSIS PERFORMED USING USEPA METHODS		9071/418.1
	FINAL PH=5.35		
TCLP EXTRACTION PROC			
ARSENIC	<0.2	0.0	5.0
Spike recovery	90		MG/L
BARIUM	<0.5	0.0	100.0
Spike recovery	97		MG/L
CADMIUM	<0.03	0.0	1.0
Spike recovery	104		MG/L
CHROMIUM	<0.3	0.0	5.0
Spike recovery	112		MG/L
SELENIUM	<0.02	0.0	1.0
Spike recovery	101		MG/L
MERCURY	<0.0002	0.0	0.2
Spike recovery	96		MG/L
LEAD	<0.2	0.0	5.0
Spike recovery	104		MG/L
SILVER	<0.05	0.0	5.0
Spike recovery	95		MG/L
NICKEL	<0.2		MG/L
Spike recovery	96		MG/L
COPPER	<0.08		MG/L
Spike recovery	104		MG/L
REACTIVITY SCREEN	REACTIVE CYANIDE <2.0 PPM		
	REACTIVE SULFIDE <2.0 PPM		
	ASTM D5049 METHOD D/D4978 METHOD B		
CORROSIVITY SCREEN	SAMPLE IS NONCORROSIVE, PH = 9.15		
	ASTM D4980 METHOD B/USEPA 9040		
IGNITABILITY TEST	SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION.		
	ASTM D4982 METHOD B/ASTM D93		
TCLP REVIEW	TCLP PREPARATION FOLLOWS METHOD 1311 SW-846		

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D. BFI WASTE SYSTEMS

DEYOR WILLOWCREEK LANDFILL DISTRICT

Laboratories 1043 STATE ROUTE 225

ATWATER

OH 44201

7655 Market Street, Suite 2500

Youngstown, Ohio 44512

(216) 758-5788

(800) 365-3396



WCDAAA92599 SOIL W/ ALCOHOL

SPECIMEN I.D. NUMBER

93627289

ACCESSION NO.

93 627289

COLLECTION DATE

08/26/93

COLLECTION TIME

00:00

RECEIVED

09/01/93

CLIENT I.D. NUMBER LOCATION

7289

00000

REPORTED

09/09/93

AMERICAN STEEL

TEST

RESULT

REFERENCE OR  
THERAPEUTIC RANGE

UNITS

AS REVISED NOVEMBER 24, 1992 (57FR55114)  
 REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.



BFI WASTE SYSTEMS  
 WILLOWCREEK LANDFILL DISTRICT  
 1043 STATE ROUTE 225  
 ATWATER OH 44201

7655 Market Street, Suite 2500  
 Youngstown, Ohio 44512

(216) 758-5788  
 (800) 365-3396



APPROXIMATE TESTING COSTS: 2700.00

BFI TO FOR

GENERATOR: 1000-10-500

CUST. AUTHORIZATION:

HOUSTON  
LABORATORYW.C.D.# : 92603-92607CUSTOMER : BFI (Cable Ties)

BROWNING-FERRIS INDUSTRIES

P.O.# : 855-9114SAMPLE ANALYSIS REQUEST / CHAIN OF CUSTODY  
SPECIAL WASTEAssigned to  
Laboratory:De Goe LaboratoriesCenter Point

Location:

Cardman OH

Phone:

WC or BFI Lab No.	Waste Description	Volume/ Container	Matrix	Analysis Requested	Result Y/N
<u>92603</u>	<u>Soil with Diesel</u>			<u>Metals TPH-B.T.P.</u>	
<u>92602</u>	<u>Washed Black w. TL Soils</u>			<u>Metals Pb-Sn-Vs!</u>	
	<u>TL</u>			<u>RCI</u>	
<u>92599</u>	<u>1st Soil with</u>			<u>1st Priority Metals</u>	
	<u>Alcohol</u>			<u>RCI TPH</u>	

Matrix Codes: SO = soil; MP = multi-phase; OR = organic; SW = solid; SS = semi-solid

Remarks:

Safety

Precautions:

Normal

Laboratory Hygiene [ ]

Avoid skin/

eye contact [ ]

Avoid breathing

vapors/dust [ ]

Special Handling/Storage:

Sample(s) Taken By:	Date/Time:	Company:
Sample(s) Submitted By:	Date/Time:	Company:
Sample(s) Couriers by:	Date/Time:	Company:
Sample(s) Received by:	Date/Time:	Company:

Receiving Laboratory's comments:

Note: This form must be completed and returned with the analytical data report.







# Waste Systems

BROWNING-FERRIS INDUSTRIES

WCD No. AA 92803

BFI WASTE CODE

## WASTE EVALUATION REQUEST

BFI to complete this area.

BFI Initiator McGowanLocation Blount CoCompany Number 219 Date 9-22-93Telephone Number (216) 947-2548Action Requested: ☒ New Waste Approval☐ Up-Date Approval ☐ Priority☐ Other

Previous Laboratory Number

Management Method Requested: ☒ Landfill ☐ Hauling☐ OtherDisposal Site Requested 218-219-855Company Number 219 P.O. NumberAnalyses Requested: ☐ TCLP ☐ RCI☒ Other 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100Analyses To Follow: ☒ TCLP ☐ Other corrected

## WASTE CHARACTERIZATION DATA

## Special Waste

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

## 1. GENERATOR INFORMATION

a) Generator's Name: American Steel Foundriesb) Generating Facility Address: 1001 E. Broadway St.City: Alliance State: OH Zip: 44601c) Company Representative: T.C. BrownTitle: Environmental Managerd) Emergency Contact: T.C. BrownTitle: Same

e) Local Registration No.

Generator's EPA Id. No. OH0988090418f) Telephone No. (216) 823-6150After Hours No. (216) 823-6150Emergency No. (216) 823-6150

## 2. GENERAL WASTE STREAM INFORMATION

a) Description of The Waste: SOIL WITH DIESEL FUELb) Process Generating Waste: RETURNED FUEL TANK FROM PLANT TRUCKc) Is this a treatment residue of a waste which was previously a restricted characteristically hazardous waste? ☐ Yes ☒ Nod) Is this a "Hazardous Waste" as defined by State or local Regulations? ☐ Yes ☒ No

If yes, enter the Waste Identification Number if one has been assigned:

e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State or local Regulations?

☒ Yes ☐ No If yes, enter Waste Identification Number: NAf) Recommended personal protection equipment and special handling procedures: Noneg) Anticipated Volume: One ☐ Gallons ☐ Tons ☒ Cubic Yards ☐ OtherPer: ☐ Day ☐ Week ☐ Month ☐ Year ☒ One Time, or ☐ OtherTo be transported in: ☒ Bulk ☐ Drums (type/size) ☐ Otherh) Is a representative sample included? ☒ Yes ☐ No - If yes, complete the RSC found on the reverse side.

## 3. WASTE PROPERTIES @ 72°F

a) Physical State:

☒ Solid ☐ Semi-solid☐ Powder ☐ Liquid☐ Combination

b) Odor:

Describe DIESEL FUEL☐ None ☒ Mild ☐ Strong

c) Flash Point, °F:

☐ ≤72 ☐ 73-100 ☐ 101-140☐ 141-200 ☐ ≥201 ☐ N/A ☒ N/D

d) Layers:

☒ Single Phase ☐ Bi-layered ☐ Multi-layered

e) Density Range:

to

☒ N/D ☐ lbs./gal. ☐ g/cc.☐ lbs./yd.<sup>3</sup> ☐ Other

f) Color(s):

Describe BROWN AND BLACK

g) pH:

☐ ≤2.0 ☐ 2.1-5.0 ☐ 5.1-9.0☐ 9.1-12.4 ☐ ≥12.5 ☐ N/A ☒ N/D

## 4. REACTIVITY

Note if the waste exhibits any of the following reactive properties:

☐ Water Reactive ☐ Alkaline Reactive ☐ Pyrophoric ☐ Thermally Sensitive☐ Acid Reactive ☐ Autopolymerizable ☐ Explosive ☐ Shock Sensitive☒ None of the above



CORPORATE WASTE  
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 09/24/93  
BFI Location : WILLOWCREEK LF  
BFI Initiator : CASANTA, A.  
Generator : AMERICAN STEEL FOUNDRIES  
Generator Location : ALLIANCE, OH  
Waste Description : SOIL W/DIESEL FUEL  
BFI Lab Number : 209874

PRETREATMENT & DISPOSAL RECOMMENDATIONSafety Precautions : Avoid Skin & Eye ContactRECOMMENDED:Direct Landfill Burial: Amount of Original Waste 100% by vol.Sanitary.. BFI Mahoning, Willowcreek, & Lorain CountyComments:

Approved for one time only disposal. See the attached Chain of Custody and analytical data from DeVor Laboratories as received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation is based upon a review of the information provided by the generator. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/858:219:218/940924/209874

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco  
Technical Representative



WCD#AA92603 SOIL W/ DIESEL

SPECIMEN I.D. NUMBER

93627287

ACCESSION NO.

93 627287

COLLECTION DATE

09/01/93

CLIENT I.D. NUMBER LOCATION

7287

COLLECTION TIME

00:00

RECEIVED

09/01/93  
REPORTED

09/22/93

AMERICAN STEEL

TEST	RESULT		REFERENCE OR THERAPEUTIC RANGE		UNITS
	NORMAL	ABNORMAL			
TCLP EXTRACTION PROC	FINAL PH=5.70				
TCLP METALS & BIAS %					
ARSENIC	<0.2		0.0	5.0	MG/L
Spike recovery	88				%
BARIUM	<0.3		0.0	100.0	MG/L
Spike recovery	108				%
CADMIUM	<0.03		0.0	1.0	MG/L
Spike recovery	103				%
CHROMIUM	<0.3		0.0	5.0	MG/L
Spike recovery	112				%
SELENIUM	<0.02		0.0	1.0	MG/L
Spike recovery	99				%
MERCURY	<0.0002		0.0	0.2	MG/L
Spike recovery	88				%
LEAD	<0.2		0.0	5.0	MG/L
Spike recovery	97				%
SILVER	<0.05		0.0	5.0	MG/L
Spike recovery	95				%
TCLP SUPPL.METALS					
NICKEL	0.25				MG/L
Spike recovery	96				%
COPPER	<0.08				MG/L
Spike recovery	105				%
REACTIVITY SCREEN	REACTIVE CYANIDE <2.0 PPM REACTIVE SULFIDE <2.0 PPM ASTM D5049 METHOD D/D4978 METHOD B				
CORROSIVITY SCREEN	SAMPLE IS NONCORROSIVE, PH = 9.55 ASTM D4980 METHOD B/USEPA 9040				
IGNITABILITY TEST	FLASHED AT 175 F ASTM D4982 METHOD B/ASTM D93				
TOT.PETRO.HYDROCARB.	34232				PPM
B-E-T-X	ANALYSIS PERFORMED USING USEPA METHODS 9071/418.1				
METHOD NUMBER	8240				
QUANTITATION LIMIT	0.50				PPM

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.  
Anthony Nasrallah Ph.D.

**DEYOR**  
Laboratories
7655 Market Street, Suite 2500  
Youngstown, Ohio 44512  
(216) 758-5788  
(800) 365-3396BFI WASTE SYSTEMS  
WILLOWCREEK LANDFILL DISTRICT  
1043 STATE ROUTE 225  
ATWATER OH 44201



██

WCD#AA92603 SOIL W/ DIESEL

SPECIMEN I.D. NUMBER  
93627287

ACCESSION NO.  
93 627287

COLLECTION DATE  
09/01/93  
CLIENT I.D. NUMBER LOCATION

COLLECTION TIME  
00:00

RECEIVED  
09/01/93  
REPORTED  
09/22/93

AMERICAN STEEL

7287

00000

TEST	RESULT	REFERENCE OR THERAPEUTIC RANGE	UNITS
	NORMAL		
	ABNORMAL		

BENZENE  
TOLUENE  
ETHYLBENZENE  
XYLENE  
LABORATORY ANALYST

ND

7.6  
7.9  
36.0

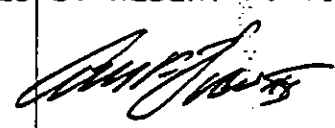
PPM  
PPM  
PPM

SPECIALIZED ASSAYS

TCLP REVIEW

A.I.H.A. ACCREDITED LABORATORY (# 365).

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846  
AS REVISED NOVEMBER 24, 1992 (57FR33114)  
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---  
Patrick K. Jaynes Ph.D.  
Anthony Nasrallah Ph.D.

**DEYOR**  
Laboratories

7655 Market Street, Suite 2500  
Youngstown, Ohio 44512  
(216) 758-5788  
(800) 365-3396

BFI WASTE SYSTEMS  
WILLOWCREEK LANDFILL DISTRICT  
1043 STATE ROUTE 225  
ATHWATER OH 44201





D-14

CUST. AUTHORIZATION:

HOUSTON  
LABORATORY

W.C.D.# : 92603-92607

CUSTOMER : BFI Chemical

BROWNING-FERRIS INDUSTRIES

P.O.# : 855-9154

SAMPLE ANALYSIS REQUEST / CHAIN OF CUSTODY  
SPECIAL WASTEAssigned to  
Laboratory:

De/for Laboratories

Contact: Runtz

Location:

Baldman OH

Phone:

WCI or BFI Lab No.	Waste Description	Volumes/ Containers	Matrix	Analyses Requested	Rush Y/N
627287 92603	Soil w. P. Diesel			W. Tals. TPH - B. Tol.	
627288 92602	W. & B. Black w. Th. Soil			M. P. L. S. Tol. - B. Tol.	
	Test			RCE	
627289 92589	1st Soil with H. L. L.			1st Priority Test RCE TPH	

Matrix Codes: SO = soil; MP = multi-phase; OR = organic/oil; SW = solid; SS = semi-solid

Remarks:

Safety

Precautions:

Normal

Laboratory Hygiene [ ]

Avoid skin/

eye contact [ ]

Avoid breathing

vapors/dust [ ]

Special Handling/Storage:

Sample(s) Taken By:	Date/Time:	Company:
Sample(s) Submitted By: Al Cravotta	Date/Time: 8-26-93	Company: BFI-Wilmington
Sample(s) Couriers by: Chuck Martin	Date/Time: 9-1-93	Company: De/for Ship Ticket No.
Sample(s) Received by: V. J. Runtz	Date/Time: 9-1-93 15:30	Company: De/for

Receiving Laboratory's comments:

Note: This form must be completed and returned with the analytical data report.



WASTE EVALUATION REQUEST

BFI to complete this area

BFI Initiator Al Caranta  
Location Atwater, CA  
Company Number 219 Date 5-29-93  
Telephone Number (216) 947-2548  
Action Requested: ☒ New Waste Approval  
☐ Up-Date Approval ☐ Priority  
☐ Other

Previous Laboratory Number \_\_\_\_\_  
Management Method Requested: ☒ Landfill ☐ Hauling  
☐ Other \_\_\_\_\_  
Disposal Site Requested 218-219-855  
Company Number 219 P.O. Number \_\_\_\_\_  
Analyses Requested: ☐ TCLP ☐ RC1  
☒ Other Water  
Analyses To Follow: ☒ TCLP ☐ Other Attached

WASTE CHARACTERIZATION DATA

Special Waste

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: American Steel Foundries  
b) Generating Facility Address: 1001 E. Broadway  
City: Allanwood State: PA Zip: 44601  
c) Company Representative: J.C. Buckner  
Title: Env. Mgr.  
d) Emergency Contact: J. Gamm  
Title: \_\_\_\_\_

e) Local Registration No. \_\_\_\_\_  
Generator's EPA Id. No. CHD 931690418  
f) Telephone No. (216) 223-6150  
After Hours No. ( ) \_\_\_\_\_  
Emergency No. ( ) \_\_\_\_\_

2. GENERAL WASTE STREAM INFORMATION

- a) Description of The Waste: WOOD BLOCKS WITH SOIL AND TAR AND FLOOR SWEEPINGS  
ON 219/940212/302143 FROM STEEL FOUNDRY  
b) Process Generating Waste: OLD SHIPPING BUILDING FLOOR RENOVATION  
c) Is this a treatment residue of a waste which was previously a restricted characteristically hazardous waste? ☐ Yes ☒ No  
d) Is this a "Hazardous Waste" as defined by State or local Regulations? ☐ Yes ☒ No  
If yes, enter the Waste Identification Number if one has been assigned: \_\_\_\_\_  
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State or local Regulations?  
☒ Yes ☐ No If yes, enter Waste Identification Number: NA  
f) Recommended personal protection equipment and special handling procedures: NONE  
g) Anticipated Volume: 30-100 ☐ Gallons ☐ Tons ☒ Cubic Yards ☐ Other \_\_\_\_\_  
Per: ☐ Day ☐ Week ☐ Month ☒ Year ☐ One Time, or ☐ Other \_\_\_\_\_  
To be transported in: ☒ Bulk ☐ Drums (type/size) \_\_\_\_\_ ☐ Other \_\_\_\_\_  
h) Is a representative sample included? ☒ Yes ☐ No - If yes, complete the RSC found on the reverse side.

3. WASTE PROPERTIES @ 72°F

- a) Physical State:  
☒ Solid ☐ Semi-solid  
☐ Powder ☐ Liquid  
☐ Combination \_\_\_\_\_  
b) Odor:  
Describe TAR  
☐ None ☒ Mild ☐ Strong  
c) Flash Point, °F:  
☐ ≤ 72 ☐ 73-100 ☐ 101-140  
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D  
d) Layers:  
☒ Single Phase ☐ Bi-layered ☐ Multi-layered  
e) Density Range: \_\_\_\_\_ to \_\_\_\_\_  
☒ N/D ☐ lbs./gal. ☐ g/cc.  
☐ lbs./yd.<sup>3</sup> ☐ Other \_\_\_\_\_  
f) Color(s):  
Describe BLACK AND BROWN  
g) pH:  
☐ ≤ 2.0 ☐ 2.1-5.0 ☐ 5.1-9.0  
☐ 9.1-12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

4. REACTIVITY

Note if the waste exhibits any of the following reactive properties: ☐ Water Reactive ☐ Alkaline Reactive ☐ Pyrophoric ☐ Thermally Sensitive  
☐ Acid Reactive ☐ Autopolymerizable ☐ Explosive ☐ Shock Sensitive ☒ None of the above



## 5. THIS WASTE CONTAINS

Note if the waste contains any of the following:

- |                                       |   |   |  |
|---------------------------------------|---|---|--|
| <input type="checkbox"/> Free Liquids | <input type="checkbox"/> Dioxins          | <input type="checkbox"/> Etiological Agents         | <input type="checkbox"/> Radioactive Materials |
| <input type="checkbox"/> Free Cyanide | <input type="checkbox"/> Organic Solvents | <input type="checkbox"/> Pathogens                  | <input type="checkbox"/> PCBs not regulated by |
| <input type="checkbox"/> Free Sulfide | <input type="checkbox"/> Used Oils        | <input checked="" type="checkbox"/> OSHA Substances | TSCA 40 CFR 761                                |
| <input type="checkbox"/> Free Ammonia | <input type="checkbox"/> Virgin Oils      | <input type="checkbox"/> Biological Materials       | <input type="checkbox"/> None of the above     |

If any of the above are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.

## 6. COMPLETE WASTE COMPOSITION

Concentration ranges are suggested, but total must equal 100%. Units must be identified and are to be in parts per million (ppm) and/or percentages (%). Attach additional pages if necessary.

Components	Range Min. / Max.	Components	Range Min. / Max.
WOOD BLOCKS	80 %		
CONCRETE	8 %		
SOIL	10 %		
TAR	2 %		

## 7. TRANSPORTATION INFORMATION

If the waste is a DOT Hazardous Material, complete the following:

Proper USDOT Shipping Name: NA

USDOT Hazard Class: \_\_\_\_\_ UN or NA Number: \_\_\_\_\_ CERCLA Reportable Quantity: \_\_\_\_\_

## 8. SUPPLEMENTAL INFORMATION

- ☒ None
 ☐ MSD Sheets
 ☐ Analytical Data
 ☐ Memo/Letter
 ☐ Waste Composition
- ☐ Other - describe \_\_\_\_\_ No. of Pages \_\_\_\_\_

## 9. GENERATOR'S CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exists, that all known or suspected hazards have been disclosed, and that the waste is not designated a Hazardous Waste by the USEPA or contains PCBs regulated by TSCA 40 CFR 761.

GENERATOR'S AUTHORIZED SIGNATORY:

9/17/93 T.C. BRADWAY T.C. Bradway Environmental Manager PCB-  
 DATE PRINT NAME SIGNATURE TITLE INITIALS

## REPRESENTATIVE SAMPLE CERTIFICATE

This Section is to be completed by the person obtaining the sample of the above described waste, preferably a representative of the generator. DO NOT COLLECT OR SUBMIT SAMPLES THAT ARE RADIOACTIVE, SHOCK SENSITIVE, EXPLOSIVE, OR PYROPHORIC.

I certify that the sample identified below that is being forwarded to BFI for evaluation is representative of the waste described above. I also understand that, should the waste material described herein not be acceptable for management by BFI Waste Systems, the sample(s) may be returned to the generator.

Collector's Name: T.C. Bradway

(Peel Off Label)

Signature: T.C. Bradway

Generator's Name: \_\_\_\_\_

Company: AMERICAN STEEL FOUNDRIES

Waste Description: \_\_\_\_\_

Title: ENVIRONMENTAL MANAGERDate Collected: \_\_\_\_\_ WCD No. AA 90500Telephone Number: (316) 823-6150

Date at BFI Lab: \_\_\_\_\_ BFI Lab No. \_\_\_\_\_



CORPORATE WASTE  
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

(2)

DATE : 10/06/93  
BFI Location : WILLOWCREEK LF  
BFI Initiator : CASANTA, A.  
Generator : AMERICAN STEEL FOUNDRIES  
Generator Location : ALLIANCE, OH  
Waste Description : WOOD BLOCKS W/SOIL AND TAR  
BFI Lab Number : 209873

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial: Amount of Original Waste 100% by vol.

Sanitary.. BFI Mahoning, Willowcreek, & Lorain County

Comments:

See the attached Chain of Custody and analytical data from DeYor Laboratories as received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation is based upon a review of the information provided by the generator. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/855:219:218/941005/209873

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco  
Technical Representative





D-R

WCD#AA92602 WOOD BLOCK &amp; SOIL

SPECIMEN I.D. NUMBER

93627288

ACCESSION NO.

93 627288

COLLECTION DATE

08/26/93

COLLECTION TIME

00:00

RECEIVED

09/01/93

CLIENT I.D. NUMBER LOCATION

7288

00000

REPORTED  
09/21/93

AMERICAN STEEL

TEST	RESULT	REFERENCE OR THERAPEUTIC RANGE		UNITS
TCLP EXTRACTION PROC	FINAL PH=6.15			
ZERO HEADSPACE EXTRT	9/10/93			
TCLP METALS & BIAS %				
ARSENIC	<0.2	0.0	5.0	MG/L
Spike recovery	92			%
BARIUM	<0.5	0.0	100.0	MG/L
Spike recovery	104			%
CADMIUM	<0.03	0.0	1.0	MG/L
Spike recovery	104			%
CHROMIUM	<0.3	0.0	5.0	MG/L
Spike recovery	111			%
SELENIUM	<0.02	0.0	1.0	MG/L
Spike recovery	96			%
MERCURY	<0.0002	0.0	0.2	MG/L
Spike recovery	98			%
LEAD	<0.2	0.0	5.0	MG/L
Spike recovery	105			%
SILVER	<0.05	0.0	5.0	MG/L
Spike recovery	98			%
TCLP SUPPL.METALS				
NICKEL	0.75			MG/L
Spike recovery	97			%
COPPER	<0.08			MG/L
Spike recovery	106			%
TCLP VOA'S & BIAS %				
METHOD NUMBER	8240			
VINYL CHLORIDE	<0.10	0.0	0.2	MG/L
Spike recovery	80			%
1,1-DICHLOROETHYLENE	<0.10	0.0	0.7	MG/L
Spike recovery	74			%
METHYL ETHYL KETONE	<1.0	0.0	200	MG/L
Spike recovery	164			%
CHLOROFORM	<0.10	0.0	6.0	MG/L
Spike recovery	84			%
CARBON TETRACHLORIDE	<0.10	0.0	0.5	MG/L
Spike recovery	78			%
BENZENE	<0.10	0.0	0.5	MG/L
Spike recovery	82			%

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.

BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT

1043 STATE ROUTE 225

ATWATER

OH 44201


**DEYOR**  
Laboratories

 7655 Market Street, Suite 2500  
 Youngstown, Ohio 44512  
 (216) 758-5788  
 (800) 365-3396



D-19

WCD#AA92602 WOOD BLOCK &amp; SOIL

SPECIMEN I.D. NUMBER

93627288

ACCESSION NO.

93 627288

COLLECTION DATE

08/26/93

COLLECTION TIME

00:00

RECEIVED

09/01/93

CLIENT I.D. NUMBER LOCATION

7288

00000

09/21/93

AMERICAN STEEL

TEST	RESULT	REFERENCE OR THERAPEUTIC RANGE		UNITS
1,2-DICHLOROETHANE	<0.10	0.0	0.5	MG/L
Spike recovery	80			%
TRICHLOROETHYLENE	<0.10	0.0	0.5	MG/L
Spike recovery	82			%
TETRACHLOROETHYLENE	<0.10	0.0	0.7	MG/L
Spike recovery	82			%
CHLOROBENZENE	<0.10	0.0	100.0	MG/L
Spike recovery	82			%
1,4-DICHLOROBENZENE	<0.10	0.0	7.5	MG/L
Spike recovery	60			%
TCLP BNA'S & BIAS %				
METHOD NUMBER	8270			
PYRIDINE	<0.10	0.0	5.0	MG/L
Spike recovery	76			%
o-CRESOL	<0.10	0.0	200	MG/L
Spike recovery	57			%
m-CRESOL	<0.10	0	200	MG/L
Spike recovery	51			%
p-CRESOL	<0.10	0.0	200	MG/L
Spike recovery	51			%
2,4-DINITROTOLUENE	<0.10	0.0	0.13	MG/L
Spike recovery	80			%
HEXACHLOROBUTADIENE	<0.10	0.0	0.50	MG/L
Spike recovery	46			%
HEXACHLOROETHANE	<0.10	0.0	3.0	MG/L
Spike recovery	48			%
NITROBENZENE	<0.10	0.0	2.0	MG/L
Spike recovery	52			%
PENTACHLOROPHENOL	<0.10	0.0	100.	MG/L
Spike recovery	67			%
2,4,5-TRICHLOROPHEN	<0.10	0.0	400.	MG/L
Spike recovery	73			%
2,4,6-TRICHLOROPHEN	<0.10	0.0	2.0	MG/L
Spike recovery	71			%
HEXACHLOROBENZENE	<0.10	0.0	0.13	MG/L
Spike recovery	95			%
REACTIVITY SCREEN	REACTIVE	CYANIDE	<2.0 PPM	
	REACTIVE	SULFIDE	<2.0 PPM	

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.

**DEYOR**  
Laboratories

BFI WASTE SYSTEMS  
WILLOWCREEK LANDFILL DISTRICT  
1043 STATE ROUTE 225  
ATWATER OH 44201

355 Market Street, Suite 2500  
Cungstown, Ohio 44512  
(616) 758-5788  
(200) 365-3396



WCD#AA92602 WOOD BLOCK &amp; SOIL

SPECIMEN I.D. NUMBER

93627288

ACCESSION NO.

93 627288

COLLECTION DATE

08/26/93

CLIENT I.D. NUMBER LOCATION

7288

COLLECTION TIME

00:00

RECEIVED

09/01/93  
REPORTED

09/21/93

AMERICAN STEEL

00000

TEST

RESULT

REFERENCE OR  
THERAPEUTIC RANGE

UNITS

CORROSIVITY SCREEN

ASTM D5049 METHOD D/D4978 METHOD B

SAMPLE IS NONCORROSIVE, PH = 9.25  
ASTM D4980 METHOD B/USEPA 9040

IGNITABILITY TEST

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION.  
ASTM D4982 METHOD B/ASTM D93

TCLP REVIEW

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846  
AS REVISED NOVEMBER 24, 1992 (57FR55114)  
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR


--- DIRECTORS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.  
Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.

7655 Market Street, Suite 2500  
Youngstown, Ohio 44512  
(216) 758-5788  
(800) 365-3396

--- PATHOLOGISTS ---

BFI WASTE SYSTEMS  
WILLOWCREEK LANDFILL DISTRICT  
1043 STATE ROUTE 225  
ATWATER OH 44201



APPROXIMATE TESTING COSTS: 2700.00GENERATOR: Browning-Ferris Industries

CUST. AUTHORIZATION:

W.C.D.# : 92603-92602CUSTOMER : BFI (Browning-Ferris Industries)P.O.# : 855-9155HOUSTON  
LABORATORY

BROWNING-FERRIS INDUSTRIES

SAMPLE ANALYSIS REQUEST / CHAIN OF CUSTODY  
SPECIAL WASTEAssigned to  
Laboratory:De York Laboratories

Contract:

De York

Location:

Bardonia, OH

Phone:

WCI or BFI Lab No.	Waste Description	Volume/ Container	Matrix	Analyses Requested	Rush Y/N
92603	Soil with Diesel			RII	
92602	Waste Black w. Th. Soil			M. Tox - TPH - Botol	
	Th. Soil			RII	
92589	1st Soil with Alcohol			1st Priority Methyl RII TPH	

Matrix Codes: SO = soil; MP = multi-phase; OR = organic/oil; SW = solid; SS = semi-solid

Remarks:

Safety

Precautions:

Normal

Laboratory Hygiene [ ]

Avoid skin/

eye contact [ ]

Avoid breathing

vapors/dust [ ]

Special Handling/Storage:

Sample(s) Taken By:	Date/Time:	Company:
Sample(s) Submitted By:	Date/Time:	Company:
Sample(s) Couriers by:	Date/Time:	Company:
Sample(s) Received by:	Date/Time:	Company:

Receiving laboratory's comments:

Note: This form must be completed and returned with the analytical data report.







# American Steel Foundries

1001 EAST BROADWAY \* P.O. BOX 2060 \* ALLIANCE, OHIO 44601

(216) 823-6150 \* FAX NO. (216) 821-4568

September 03, 1993

**RECEIVED**  
SEP 14 1993

**CERTIFIED LETTER  
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 S. Dearborn St.  
Chicago, Illinois 60604  
Attention: James Saric

P 329 880 567

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
77 West Jackson Blvd.  
Chicago, Illinois 60604  
Attention: Richard Clarizio

P 329 880 566

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

**Progress Report # 5**

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

**C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

On August 05, 1993, American Steel Foundries received approval for the Electric Arc Furnace Closure Plan.

Since the approval, we have placed a purchase order with RMT Engineering & Environmental Management to perform the additional required background sampling and on August 30, 1993, those samples were taken. We are currently awaiting the test results.

We are in process of receiving competitive bids for the physical closure work and plan to award contracts in the near future.

**UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)**

**E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS**

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

On July 8, 1993 the Ohio EPA submitted written comments to American Steel Foundries covering deficiencies in the "Ground Water Quality Assessment Plan" and the "Ground Water Sampling and Analysis Plan" for the Sebring landfill. On August 5, 1993 American Steel Foundries responded to the Ohio EPA request and supplemented the plans. We are currently awaiting comments from the Ohio EPA.

**TEST RESULTS AND SAMPLING SUMMARY**

Our experiments to reduce lead and cadmium in EAF dust continue.

Since the last report, our test results indicate that not all loads of dust sampled are under regulatory limits for lead and cadmium. Therefore, we are pursuing a program with Envirote Corporation that will entail composite sampling of each load. The individual loads will be shipped off site as either hazardous or nonhazardous material, depending upon the sample test results. Only those loads that are clearly below regulatory limits will be shipped as nonhazardous material and all sampling will be completed before the load is permitted to be taken off site.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In accordance with our bi-annual waste stream analysis program, we have started our re-sampling of all waste streams.

**UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)**

**GENERAL**

Please be advised of the following changes:

1. On July 26, 1993, we were directed by Mr. James Saric from the U.S. EPA, Region V to change our certified letter routing in the Chief, RCRA Enforcement Branch from the attention of Ms. Kimberly Ogle to the attention of Mr. James Saric.
2. In accordance with the terms and conditions of the Ohio Consent Order # 1993CV01107, signed July 12 1993, we will be forwarding an additional copy of all reports required under Civil Action No. C87-128A (N.D. Ohio) to the attention of Ohio EPA, Supervisor, Division of Solid and Infectious Waste Management, Northeast District Office, 2110 East Aurora Ave., Twinsburg, Ohio 44087-1969.
3. Effective September 1 1993, Mr. John F. Oesch has assumed the duties of Plant Manager, Alliance Plant, American Steel Foundries and as such, he has become the official plant contact and the individual authorized to sign legal documentation for American Steel Foundries at that facility.

**ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

**CERTIFICATION**

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

  
J. F. Oesch  
PLANT MANAGER

/TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

cc: CAR  
DJM  
VTH  
ERH

Ohio EPA  
Chief, Division of Solid and Hazardous Waste P 329 880 564  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43268-0149

Ohio EPA  
Division of Solid and Hazardous Waste P 329 880 565  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Ohio EPA  
Supervisor, division of Solid and Infectious Waste Management P 329 880 563  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.  
Amsted Industries, Inc.  
44th Floor - Boulevard Towers South  
205 N. Michigan Ave.  
Chicago, Illinois 60601

P. C. Schillawski  
Squire Sanders & Dempsey P 329 880 570  
4900 Society Center  
127 Public Square  
Cleveland, Ohio 44114-1304

Mahoning County Health District  
Chief, Solid Waste Program  
2801 Market Street  
Youngstown, Ohio 44507-1649  
Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTE.TB5



# American Steel Foundries

1001 EAST BROADWAY \* P.O. BOX 2060 \* ALLIANCE, OHIO 44601

(216) 823-6150 \* FAX NO. (216) 821-4568

July 8, 1993

**RECEIVED**  
JUL 15 1993

**Certified Letter  
Return Receipt Requested**

Chief, RCRA Enforcement Branch, 5HR-12  
U. S. EPA, Region V  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Kimberly Oogle

Certified No. P 738 585 537

Chief, SWERB Section V  
Office of Regional Counsel  
U. S. EPA Regional V, 5CS-TUB3  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Richard Clarizio

Certified No. P 738 585 536

## **UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)**

### **Progress Report #4**

This submittal is intended to meet the Progress Report requirements of Section X of the Consent Decree. The numbering of each item conforms with the Consent Decree sequence.

The following have been completed since the last report.

### **C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS**

3. If Ohio EPA does not approve the Alliance EAF baghouse Closure Plan, defendant shall submit to Ohio EPA, with copy to U. S. EPA a revised or modified Alliance Closure Plan in accordance with Ohio Admin. Code 3745-66-12(D)(4).

On May 5, 1993, the OEPA sent a "Notice of Deficiency" to American Steel Foundries on the Closure Plan for the EAF Dust Collector Bag House area. Corrections to the Plan were made and resubmitted to the OEPA on June 3, 1993.

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284A  
N.D. OHIO)

We are current with all reporting requirements and are awaiting Ohio EPA approval of the following:

1. The Sebring Facility Ground Water Assessment Plan.
2. The EAF Dust Collector Closure Plan as resubmitted on 6-3-93.
3. The Sebring Facility Closure Plan.
4. The Sebring Facility Test Plot Plan.

American Steel Foundries has submitted a test plot plan for the use of foundry material as an alternative to clay in the final cover design for the Sebring Landfill Facility Closure Plan and we are currently obtaining competitive contractor quotations for that work.

#### Test Results and Sampling Summary

Our experiments to reduce lead and cadmium in EAF dust continue.

Since the last report, test results have indicated that we are averaging below regulatory limits for EAF dust but we have not been able to keep all loads in the non-hazardous range.

We have approached Envirote Corporation who treats our EAF dust and are currently evaluating a progressive approach to dust disposal. The program would require a composite "Tclp" metals only analysis to be performed on each load of dust before the material leaves the plant. If the load is hazardous, then it would be treated by Envirote to render it non-hazardous before disposal. However, if the Tclp analysis indicates the load to be non-hazardous, then it would be disposed of by Envirote's County Environmental section as a non-hazardous material.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In accordance with our bi-annual waste stream analysis program, we have started our re-sampling of all waste streams.

An alternate waste stream was evaluated during the last two months and approximately 1½ cubic yards of a mixture of phenolic resin, sand and oil dry were disposed of by Browning Ferris Industries. The phenolic resin from a leaky pump had been contained with a mixture of oil dry and sand during clean up and was not reusable in our process because of the presence of the oil dry. The mixture was collected, stored, sampled and disposed of in accordance with EPA procedures. (Attachment "B").

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284A  
(N.D. OHIO)

In addition, Browning Ferris Industries, our current solid waste handler, has recertified the following waste streams for an additional year:

1. Clay, oil dry and paint sludge.
2. Cooling bed dust.
3. Shot blast dust. (Attachment "D")

Envirite, our hazardous waste handler has recertified our "EAF" dust waste stream for an additional year. (Attachment "C").

American Steel Foundries is actively pursuing the processing of foundry waste materials to be used as cover materials for the landfill and are currently obtaining competitive quotations for the screening and separation of that material in accordance with closure specifications.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this Progress Report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portions(s) of this submission of document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

Yours very truly,

  
J. A. DIFLOURE  
PLANT MANAGER

TCB:bje  
cc:DJM  
VTH  
JAD

Enclosure

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284-A  
N.D. OHIO)

Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43265-0149 P 738 585 535

Ohio EPA  
Division of Solid and Hazardous Waste  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969 P 738 585 534

Edward Brosius, Esq.  
AMSTED Industries, Inc.  
44th Floor - Boulevard Towers South  
205 N. Michigan Avenue  
Chicago, Illinois 60601 P 738 585 263

American Steel Foundries  
10 South Riverside Plaza - 10th Floor  
Chicago, Illinois 60606 P 738 585 264  
Attn: C. A. Ruud

P. C. Schillawski  
Squire, Sanders & Dempsey  
4900 Society Center  
127 Public Square  
Cleveland, Ohio 4414-1304 P 738 585 265

Edward R. Hanson  
Project Manager  
American Steel Foundries  
Manufacturing Research Engineering Center  
3761 Canal Street P 069 816 825  
East Chicago, Indiana 46312





# American Steel Foundries

1001 EAST BROADWAY \* P. O. BOX 2060 \* ALLIANCE, OHIO 44601

(216) 823-6150 \* FAX NO. (216) 821-4568

March 10, 1993

**Certified Letter**  
**Return Receipt Requested**

P 134 874 085

Chief, RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Kimberly Oogle

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Richard Clarizio

Certified Letter # P 738 585 613

**RECEIVED**

MAR 16 1993

**OFFICE OF RCRA**  
**WASTE MANAGEMENT DIVISION**  
**EPA, REGION V**

## **UNITED STATES V. AMSTED INDUSTRIES, INC.** **CIVIL ACTION NO. C87-1284A (N.D. OHIO)**

### **Progress Report #2**

This submittal is intended to meet the Progress Report requirements of Section X of the Consent Decree. The numbering of each item conforms with the Consent Decree sequence.

### **C. ALLIANCE FACILITY - GENERATOR REQUIREMENTS**

The following have been completed since the last report:

2. Within 60 days of the entry of this decree, defendant shall develop and submit to Ohio EPA for review and approval, with a copy to U.S. EPA, a Closure Plan, in accordance with 40 C.F.R. SS 265.111 through 265.116, and Ohio Admin. Code S 3745-66-11 through 16, for the electric arc furnace dust hazardous waste management unit (Alliance Closure Plan) at the Alliance Facility. (See letter dated 1-26-93.)
6. Within 75 days after entry of this decree, defendant shall submit to U.S. EPA and Ohio EPA certification that it has established financial assurance mechanisms for closure at the Alliance facility in accordance with 40 C.F.R. S 265.143 and Ohio Admin. Code S 3745-66-43. This certification shall include a description of financial



**RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A**  
**(N.D. OHIO)**

assurance mechanisms. (See AMSTED letter dated 12-31-92.)

7. Within 75 days after entry of this decree, defendant shall submit to U.S. EPA and Ohio EPA documentation of compliance with liability coverage requirements of 40 C.F.R. S 265.147 and Ohio Admin. Code S 3745-65-47. (See AMSTED letter dated 12-31-92.)

**D. SEBRING FACILITY - CLOSURE AND POST CLOSURE REQUIREMENTS**

1. Within 75 days after the entry of this Decree, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Sebring Closure Plan for its Sebring facility that provides for closure as a landfill in accordance with 40 C.F.R. SS 265.112 and 265.310, and Ohio Admin. Code SS 3745-66-12 and 68-10, and other applicable requirements (except to the extent that Ohio EPA determines that a closure plan required by this subparagraph need not satisfy all the requirements of 40 C.F.R. S 265.310 and Ohio Admin. Code S 3745-68-10. Within ninety (90) days after the entry of this Decree, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Sebring Post-Closure Plan, that provides for compliance with the requirements of 40 C.F.R. SS 265.117 through 265.120 and Ohio Admin. Code SS 3745-66-17 through 20, in the event that "clean closure" of the Sebring facility cannot be achieved. A Closure Plan was submitted on 2-10-93.
4. Within 90 days after entry of this consent decree, defendant shall submit to U.S. EPA and Ohio EPA certification that it has established financial assurance mechanisms for closure and post-closure care of and liability coverage for the Sebring facility, in accordance with 40 C.F.R. SS 265.143 through 265.145 and 265.147. Each certification shall include a description of the financial assurance mechanism. Defendant shall maintain such liability coverage as long as required under 40 C.F.R. Part 265, Subpart H, and Ohio Admin. Code S 3745-66-47. A Post-Closure Plan is included in the Closure Plan submitted on 2-10-93 and financial assurances are covered in AMSTED letter dated 12-31-92.

**TEST RESULTS AND SAMPLING SUMMARY**

Since the January report, we have been conducting selective scrap experiments at our electric arc furnace to see if levels of lead and cadmium can be reduced.

Another nonhazardous waste stream, broken fluorescent light bulbs has also been added to our waste streams.

..ote: See Attached "Analytical Report"



**RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A**  
**(N.D. OHIO)**

In accordance with our bi-annual waste stream analysis program, we will be starting our resampling of all waste streams during the next reporting period and will supply "Analytical Reports" as they become available.

We will be continuing selective scrap experiments at our electric arc furnace and will continue to supply analytical data.

**ACTIONS NOT COMPLETED AS REQUIRED**

As of the time of the submittal of this Progress Report, all required actions have been completed and there are currently no anticipated problems.

**CERTIFICATION**

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

Yours very truly,

  
J. A. Difloure  
Plant Manager

TCB:jlm

Enclosure

cc: DJM  
JAD

Ohio EPA  
Chief, Division of Solid and Hazardous Waste      Certified # 134 874 086  
1800 WaterMark Drive  
P. O. Box 1049  
Columbus, Ohio 43265-0149

Ohio EPA  
Division of Solid and Hazardous Waste      Certified # 134 874 087  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969



**RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A**  
**(N.D. OHIO)**

Edward J. Brosius, Esq.  
AMSTED Industries, Inc.  
44th Floor - Boulevard Towers South  
205 N. Michigan Avenue  
Chicago, Illinois 60601

American Steel Foundries  
10 South Riverside Plaza - 10th Floor  
Chicago, Illinois 60606  
Attn: C. Ruud

P. C. Schillawski  
Squire Sanders & Dempsey  
4900 Society Center  
127 Public Square  
Cleveland, Ohio 44114-1304

Certified # 134 874 088

E. R. Hanson  
American Steel Foundries  
Manufacturing Research  
Engineering Center  
3761 Canal Street  
East Chicago, Indiana 46312







**WADSWORTH/ALERT Laboratories**

*Division of Enseco Incorporated*

**Corporate and Laboratory:**

4101 Shufflet Drive, NW  
North Canton, OH 44720

216-497-9396  
FAX 216-497-0772

## ANALYTICAL REPORT

**WILLIAM HEESTAND**

**AMERICAN STEEL FOUNDRIES**

**ENSECO-WADSWORTH/ALERT LABORATORIES**

**Alesia M. Danford**  
Project Manager

**Mark P. Nebiolo**  
Laboratory Manager

**February 23, 1993**

**Laboratories:**

Pittsburgh, PA  
412-826-5477

Tampa, FL  
813-621-0784





## AMERICAN STEEL FOUNDRIES

EAF DUST COLLECTOR 2-4-93 12:00

**EAF DUST**

WO #: B7605

LAB #: A3B120039-001

MATRIX: SOLID

DATE RECEIVED: 2/12/93

TCLP EXTRACTION DATE: 2/16/93

FINAL PH:6.8

- - - - - TCLP TOXICITY CHARACTERISTIC METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching  
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.1	mg/L	SW846 6010	2/16- 2/18/93	3047031
Arsenic	ND	0.5	mg/L	SW846 6010	2/16- 2/18/93	3047031
Barium	ND	1.0	mg/L	SW846 6010	2/16- 2/18/93	3047031
Cadmium	2.7	0.1	mg/L	SW846 6010	2/19- 2/21/93	3050005
Chromium	ND	0.1	mg/L	SW846 6010	2/16- 2/18/93	3047031
Lead	0.3	0.1	mg/L	SW846 6010	2/16- 2/18/93	3047031
Selenium	1.0	0.3	mg/L	SW846 6010	2/16- 2/18/93	3047031
Mercury	ND	0.02	mg/L	SW846 7471	2/16- 2/17/93	3047031

## NOTE:

AS RECEIVED

ND (NONE DETECTED)

3-5-93

WADSWORTH TO  
RERUN SELENIUM.  
THIS ELEMENT DOES  
NOT NORMALLY SHOW  
IN OUR SAMPLES

TCB.





## SAMPLE SUMMARY

The analytical results of the samples listed below are presented on the following pages.

<u>WO #</u>	<u>LABORATORY ID</u>	<u>SAMPLE IDENTIFICATION</u>
B7605	A3B120039-001	EAF DUST COLLECTOR 2-4-93 12:00



### Chain-of Custody Record

4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720  
(216) 497-9396

No 18375 :

[illegible]







**WADSWORTH/ALERT Laboratories**  
*Division of Ensco Incorporated*

**Corporate and Laboratory:**

4101 Shuffel Drive, NW  
North Canton, OH 44720

216-497-9396  
FAX 216-497-0772

## **ANALYTICAL REPORT**

**WILLIAM HEESTAND**

**AMERICAN STEEL FOUNDRIES**

**ENSECO-WADSWORTH/ALERT LABORATORIES**

*Alesia M. Danford*

**Alesia M. Danford**  
Project Manager

*Mark P. Nebiolo*

**Mark P. Nebiolo**  
Laboratory Manager

**February 5, 1993**

**Laboratories:**

Pittsburgh, PA  
412-826-5477

Tampa, FL  
813-621-0784





## SAMPLE SUMMARY

The analytical results of the samples listed below are presented on the following pages.

<u>WO #</u>	<u>LABORATORY ID</u>	<u>SAMPLE IDENTIFICATION</u>
B4901	A3A290022-001	012093 EAF COLLECTOR DUST BOX 1-20-93 9:00AM
B4902	A3A290022-002	012593FL MAINTENANCE 1-25-93 12:30PM





AMERICAN STEEL FOUNDRIES

012093 EAF COLLECTOR DUST BOX 1-20-93 9:00AM

WO #: B4901

LAB #: A3A290022-001

MATRIX: SOLID

**EAF DUST**

DATE RECEIVED: 1/29/93

TCLP EXTRACTION DATE: 2/02/93

FINAL PH:7.3

- - - - - TCLP TOXICITY CHARACTERISTIC METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching  
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u> <u>LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION -</u> <u>ANALYSIS DATE</u>	<u>QC</u> <u>BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Arsenic	ND	0.5	mg/L	SW846 6010	2/02- 2/03/93	3033053
Barium	ND	1.0	mg/L	SW846 6010	2/02- 2/03/93	3033053
Cadmium	1.3	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Chromium	0.7	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Lead	ND	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Selenium	ND	0.3	mg/L	SW846 6010	2/02- 2/03/93	3033053
Mercury	ND	0.02	mg/L	SW846 7471	2/02- 2/03/93	3033053

NOTE:

AS RECEIVED

ND (NONE DETECTED)





## AMERICAN STEEL FOUNDRIES

012593FL MAINTENANCE 1-25-93 12:30PM

**BROKEN FLUORESCENT LIGHT BULBS**

WO #: B4902

LAB #: A3A290022-002

MATRIX: SOLID

DATE RECEIVED: 1/29/93

TCLP EXTRACTION DATE: 2/02/93

FINAL PH:5.0

- - - - - TCLP TOXICITY CHARACTERISTIC METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching  
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Arsenic	ND	0.5	mg/L	SW846 6010	2/02- 2/03/93	3033053
Barium	ND	1.0	mg/L	SW846 6010	2/02- 2/03/93	3033053
Cadmium	ND	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Chromium	ND	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Lead	0.1	0.1	mg/L	SW846 6010	2/02- 2/03/93	3033053
Selenium	ND	0.3	mg/L	SW846 6010	2/02- 2/03/93	3033053
Mercury	0.09	0.02	mg/L	SW846 7471	2/02- 2/03/93	3033053

## NOTE:

AS RECEIVED

ND (NONE DETECTED)





## Chain-of Custody Record

4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720  
(216) 497-9396

№ 18371

[illegible]





# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

January 7, 1993

D. J. MARLBOROUGH  
PLANT MANAGER

**Certified Letter** P 069 815 855  
**Return Receipt Requested**

**RECEIVED**

JAN 11 1993

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Chief, RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Kimberly Oogle

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Richard Clarizio  
(cover letter only)

**United States v. Amsted Industries, Inc.**  
**Civil Action No. C87-1284A (N.D. Ohio)**

## **Progress Report #1**

This submittal is intended to meet the Progress Report requirements of Section X of the Consent Decree. The numbering of each item conforms with the Consent Decree sequence.

### **A. ALLIANCE FACILITY - Generator Requirements**

The following actions were completed:

1. Immediately upon entry of the Decree, ASF is to perform waste determinations at the point of generation of the waste, for all wastes currently generated at the Alliance facility which do not have existing waste determinations, in accordance with 40 CFR 262.11 and OAC 3745-52-11. All wastes have been tested. Results were submitted as an attachment to our letter dated December 10, 1992.
2. ASF submitted a Notification of Hazardous Waste Activity as a generator as required by 40 CFR 262.12. (see letter dated December 10, 1992).
3. Within 5 days of the entry of this Decree, ASF complied with the manifesting requirements as required by 40 CFR 262.20 through 262.23 and OAC 3745-52-20 through 23 by following the general requirements, the acquisition of manifests, the required information, the number of copies and the proper use of manifests.
4. Within 5 days of the entry of this Decree, ASF complied with all container pre-transportation requirements as required by 40 CFR 262.30 through 262.33 and OAC 3745-52-30 through 33 by following the rules for packaging, labeling, marking and placarding.



RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A (N.D. OHIO)

5. Within 5 days of the entry of this Decree, ASF complied with all recordkeeping requirements of 40 CFR 262.40 and OAC 3745-52-40 pertaining to keeping copies of manifests, Biennial Reports and Exception Reports, test results, and waste results.
6. Within 5 days of the entry of this Decree, ASF complied with all operating record requirements of 40 CFR 265.73 and OAC 3745-65-73 for the Alliance facility by developing and maintaining a written operating record. All information pertaining to operating record requirements which were developed by ASF prior to entry of the Decree were submitted (see letter dated December 10, 1992).
7. ASF submitted annual reports for calendar years 1987, 1988, 1989 and 1990 according to the reporting requirements of 40 CFR 262.41 and 265.75 and OAC 3745-52-41 and 3745-65-75 (see attached letter dated December 10, 1992).
8. ASF does not store, treat or dispose of hazardous waste except as provided by the requirements of 40 CFR 262.34; OAC 3745-52-34 and 40 CFR Part 268.

**B. Transporter Requirements**

The following actions were completed:

1. ASF transports all hazardous waste in accordance with the requirements of 40 CFR 263 and OAC 3745-63.

**C. ALLIANCE FACILITY - Treatment, Storage and Disposal Requirements**

The following actions were completed:

1. ASF does not treat, store or dispose of hazardous waste at the Alliance facility, except as provided for in 40 CFR 262.34 and OAC 3745-52-35.
8. Within 30 days of the entry of the Decree, ASF complied with all operating record requirements of 40 CFR 265.73 and OAC 3745-65-73 by developing and maintaining a written operating record. ASF submitted operating record information which was developed prior to the Consent Decree. (See letter dated December 10, 1992).
9. Within 15 days of the entry of the Decree, ASF complied with the personnel training and emergency and contingency plan requirements of 40 CFR 265.16 and 265.52 through 56 and OAC 3745-65-16 and 65-52 through 56.
10. Within 5 days of the entry of the Decree, ASF complied with the inspection requirements of 40 CFR 265.15 and OAC 3745-65-16 by maintaining and following the written inspection schedule.



RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A (N.D. OHIO)

The following actions will be done within the next 2 months.

2. By January 29, 1993, ASF shall develop and submit to Ohio EPA for review and approval, with copy to U.S. EPA, a Closure Plan in accordance with 40 CFR 265.111 through 265.116 and OAC 3745-66-11 through 16 for the Electric Arc Furnace Dust Hazardous Waste Management Unit.
6. By February 12, 1993, ASF shall submit to U.S. EPA and Ohio EPA certification of establishment of financial assurance mechanisms for closure at Alliance facility in accordance with 40 CFR 265.143 and OAC 3745-66-43.
7. By February 12, 1993, ASF shall submit to U.S. EPA and Ohio EPA documentation of compliance with the liability coverage requirements of 40 CFR 265.147 and OAC 3745-65-47.

**D. SEBRING FACILITY - Closure and Post-Closure Requirements**

The following actions will be done within the next 2 months:

1. By February 12, 1993, ASF shall submit to Ohio EPA, with copy to U.S. EPA, a Sebring Closure Plan that provides for closure as a landfill in accordance with 40 CFR 265.112 and 265.310 and Ohio Admin. Code 3745-66-12 and 68-10. This plan will include the required Post Closure Plan.
4. By February 12, 1993, ASF shall submit to U.S. EPA and Ohio EPA certification that it has established financial assurance mechanisms for closure and post-closure care of and liability coverage for the Sebring facility, in accordance with 40 CFR 265.143 through 265.145 and 265.147 and OAC 3745-66-43 through 66-45 and 66-47.

**E. SEBRING FACILITY - Groundwater Requirements**

The following actions were completed:

2. ASF submitted to U.S. EPA, with copy to Ohio EPA a Groundwater Sampling and Analysis Plan in accordance with the requirements of 40 CFR. 265.92 and OAC 3745-65-92 and shall follow in accordance with the schedule in the approved Groundwater Quality Assessment Plan. See our letter dated April 6, 1992.
3. ASF submitted to U.S. EPA, with copy to Ohio EPA, a Groundwater Quality Assessment Plan and a Groundwater Sampling and Analysis Plan for the Sebring facility in accordance with 40 CFR 265.93 and OAC 3745-65-93 on April 6, 1992.

**F. SEBRING FACILITY - General Operating Requirements**

The following actions were completed:





RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A (N.D. OHIO)

1. ASF does not treat, store or dispose of any solid or hazardous waste, as defined by 40 CFR 261 at the Sebring facility, except as provided for and in compliance with the approved Closure Plan or under Ohio and Federal statutes and regulations.
2. ASF submitted the annual reports, EPA Form 8700-138, for the Sebring facility which comply with the reporting requirements of 40 CFR 265.75 and 3745-65-75 for 1987, 1988, 1989 and 1990 (see letter dated December 16, 1992).

**F. SEBRING FACILITY - General Operating Requirements continued**

The following actions were completed:

3. Within 5 days of the entry of the Decree, ASF provided security at the Sebring facility in accordance with 40 CFR 265.14 and OAC 3745-65-14.
4. Within 15 days of the entry of the Decree, ASF complied with the general inspection requirements at the Sebring facility in accordance with 40 CFR 265.15 and OAC 3745-65-15 by developing and maintaining a written inspection schedule.
5. Within 30 days of the entry of this Decree ASF provided personnel training for its Sebring facility in accordance with 40 CFR 265.16 and OAC 3745-65-16.

**Test Results and Sampling Summary**

None were taken.

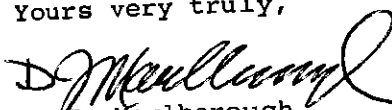
**Actions Not Completed as Required**

As of the time of the submittal of this Progress Report, all required actions have been completed and there are currently no anticipated problems.

**Certification**

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submissions or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

Yours very truly,

  
D. J. Marlborough  
Plant Manager



RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A (N.D. OHIO)

cc: Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43265-0149

Ohio EPA  
Division of Solid and Hazardous Waste  
northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Edward J. Brosius, Esq.  
AMSTED Industries, Inc.  
44th Floor - Boulevard Towers South  
205 N. Michigan Avenue  
Chicago, Illinois 60601

American Steel Foundries  
10 South Riverside Plaza - 10th Floor  
Chicago, Illinois 60606  
Attn: C. Ruud

P. C. Schillawski  
Squire Sanders & Dempsey  
4900 Society Center  
127 Public Square  
Cleveland, Ohio 44114-1304

E. R. Hanson  
American Steel Foundries  
Manufacturing Research Engineering Center  
3761 Canal Street  
East Chicago, Indiana 46312





# American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

December 10, 1992

D. J. MARLBOROUGH  
PLANT MANAGER

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Chief, RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Kimberly Oogle

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attn: Richard Clarizio

**UNITED STATES V. AMSTED INDUSTRIES, INC.**  
**CIVIL ACTION NO. C87-1284A (N.D. OHIO)**

This submittal is intended to meet the compliance requirements of the above cited Consent Decree, specifically those actions which are requested 5 days after the Consent Decree. AMSTED's counsel received notice of entry of the Consent Decree on December 4, 1992. Listed below is our response to each applicable item in the Consent Decree. Each item is numbered as found in the Consent Decree for reference.

**A. ALLIANCE FACILITY - Generator Requirements**

2. Please find attached a Notification of Hazardous Waste Activity as a generator as required by 40 CFR 262.12. This requirement is complete.
6. Please find attached all information pertaining to operating record requirements of 40 CFR 265.73 and OAC 3745-65-73 which were developed by ASF prior to entry of the Consent Decree. The requirement for submittal of operating record information prior to the Decree is complete.
7. Please find attached copies of the annual reports for calendar years 1987, 1988, 1989 and 1990 according to the reporting requirements of 40 CFR 262.41 and 265.75 and OAC 3745-52-41 and 3745-65-75. This requirement is complete.

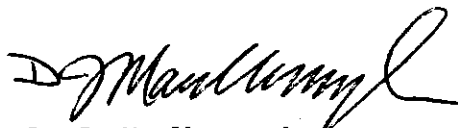
All of the material referred to above is enclosed as listed: Alliance Facility Operating Record, Book 1 & Book 2, and Alliance Baghouse Operating Record.



RE: UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87-1284A (N.D. OHIO)

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submissions or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

Yours very truly,



D. J. Marlborough  
Plant Manager

cc: Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
1800 Water Mark Drive  
P.O. Box 1049  
Columbus, Ohio 43265-0149

Ohio EPA  
Division of Solid and Hazardous Waste  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087-1969

Edward J. Brosius, Esq.  
AMSTED Industries, Inc.  
44th Floor - Boulevard Towers South  
205 N. Michigan Avenue  
Chicago, Illinois 60601

American Steel Foundries  
10 South Riverside Plaza - 10th Floor  
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Attn: C. A. Ruud

Phillip S. Szwiliawski  
Squire, Szwiliawski & Dempsey  
4900 Good Center  
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# American Steel Foundries

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(312) 258-8000 FAX NOS. (312) 258-5466 OR (312) 258-5467

NORMAN A. BERG  
PRESIDENT  
(312) 258-5400

April 6, 1992

## CERTIFIED MAIL

Chief, RCRA Enforcement Branch, 5HR-12  
U.S. EPA, Region V  
230 South Dearborn Street  
Chicago, IL 60604  
Attention: Kimberly Oogle

Chief, SWERB Section V  
Office of Regional Counsel  
U.S. EPA Region V, 5CS-TUB3  
230 South Dearborn Street  
Chicago, IL 60606  
Attention: Richard Clarizio (Letter Only)

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APR 10 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

**UNITED STATES V. AMSTED INDUSTRIES, INC.  
CIVIL ACTION NO. C87-1284A (N.D. OHIO)  
AMERICAN STEEL FOUNDRIES  
ALLIANCE, OHIO**

American Steel Foundries is making an early submittal of the Groundwater Sampling and Analysis Plan in accordance with the requirements of the 40 CFR 265.92 and OAC 3745-65-92 and the Groundwater Quality Assessment Plan for the Sebring Facility in accordance with 40 CFR 265.93 and OAC 3745-65-93.

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

  
\_\_\_\_\_  
N. A. Berg  
President

NAB:cm



cc: Ohio EPA  
Chief, Division of Solid and Hazardous Waste  
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